

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH,)
)
Plaintiff,)
)
vs.) CIVIL ACTION FILE
) NO. 1:24-cv-05158-TWT
)
DEPUTY MONIQUE TRACEY,)
et al.,)
)
Defendant.)
-----/

The Deposition of SHENEQUA JACKSON, taken on behalf of the Plaintiff, for the purposes of discovery, cross-examination, and for any and all other purposes provided by the Georgia Civil Practice Act, pursuant to Notice and by agreement of the parties, all formalities waived, before Emily Landry, Certified Court Reporter, at Buckley, Christopher & Hensel, P.C., 2970 Clairmont Road, Suite 650, Atlanta, Ga., commencing at 1:16 p.m., Tuesday, August 19, 2025

BULL & ASSOCIATES, INC.
COURT AND DEPOSITION REPORTERS
315 West Ponce de Leon Avenue, Suite 650
Decatur, Georgia 30030
(404) 256-2886

APPEARANCES OF COUNSEL:

ON BEHALF OF THE PLAINTIFF:

SPEARS & FILIPOVITZ, LLC
BY: WINGO SMITH, ATTORNEY AT LAW
315 W. Ponce de Leon Ave
Suite 865
Decatur, Georgia 30030
Wingo@civil-rights.law

SLATER LEGAL, PLLC
BY: JAMES M. SLATER
james@slater.legal

ON BEHALF OF DEFENDANT MONIQUE TRACEY:

WILLIAMS & WAYMIRE, ATTORNEYS AT LAW
BY: JASON C. WAYMIRE, ATTORNEY AT LAW
4330 South Lee Street
Building 400, Suite A
Buford, Georgia 30518
Jason@wmwlaw.com

ON BEHALF OF MS. SANCHEZ:

HUFF POWELL BAILEY
BY: ANTONIO VEAL, ATTORNEY AT LAW
999 Peachtree Street NE
Suite 950
Atlanta, Georgia 30309
aveal@huffpowellbailey.com

ON BEHALF OF SHENEQUA JACKSON:

BUCKLEY CHRISTOPHER & HENSEL
BY: TIM BUCKLEY, ATTORNEY AT LAW
2970 Clairmont Road
Suite 650
Atlanta, Georgia 30329
tbuckley@bchlwp.com

INDEX TO PROCEEDINGS
EXAMINATION INDEX

WITNESS:
SHENEQUA JACKSON
PAGE:
EXAMINATION
By MR. WINGO SMITH 4

INDEX TO EXHIBITS

EXHIBITS	DESCRIPTION	PAGE
1	Line up document	13
2	Drawing	36
3	Holding cell 7 drawing	38
4	20240709 Cam 3 1:34 a.m.	43
5	782024 Cam 9 booking area video	63

(In the following transcript, dashes [--] are used to indicate an intentional or purposeful interruption of a sentence, and ellipsis [...] is used to indicate halting speech or an unfinished sentence in dialogue, written material.)

(The Reporter's Disclosure was presented and is attached.)

PROCEEDINGS
(Witness sworn.)

Whereupon,

SHENEQUA JACKSON,
was called as a witness herein and, having been first duly sworn, was examined and deposed as follows:

CROSS-EXAMINATION

BY MR. SMITH:

Q. Good afternoon. Thank you for coming in, Deputy Jackson. My name is Wingo Smith, along with Mr. Slater here, and Mr. Filipovitz, who's not here. We represent the Plaintiff, Ezra Smith in this case. Do you remember Ezra Smith?

A. From the incident, yes, sir.

Q. Okay. Two, we're having what's called a deposition. I'm sure that your counsel has already talked to you about this, but I just want to make sure. It's like a conversation, but there's some quirks. Obviously you've been sworn in, so obviously you have to tell the truth. But the other thing is that, unlike most conversations, it's being written down. She's taking down a transcript so someone can read it later. And so for that purpose, there are a

Page 5

1 couple of things. First, we just ask that all of
2 your responses be oral, instead of, like, nodding or
3 shaking your head or "uh-huh" or "unh-unh", just say
4 "yes" or "no", or something along those lines, is
5 that okay?

6 A. Yes, sir.

7 Q. Okay. And then otherwise, we just need to
8 make sure we don't talk over each other. That
9 doesn't seem like it's going to be a problem, but
10 sometimes I know I go on too long when I'm asking
11 questions, so just give me a little patience, and I
12 promise I'll do my best to do the same for you, all
13 right?

14 A. Yes, sir.

15 MR. BUCKLEY: You're also soft spoken,
16 so speak up so she can hear you.

17 COURT REPORTER: I was just going to say
18 that. Just so I can get it on the recording, I
19 know it's a little odd, but if you speak a
20 little bit louder than you usually would in
21 normal conversation, just so I can make sure I
22 get everything down.

23 THE WITNESS: Okay. No problem. I
24 apologize.

25 COURT REPORTER: No worries.

Page 7

1 A. No, sir.

2 Q. Okay. Besides talking with your attorney,
3 was there anything else that you did in order to help
4 you recollect what happened during what you called,
5 the incident, with Ezra Smith?

6 A. Did I -- what? I'm sorry.

7 Q. It's fine.

8 A. Instead of doing, what?

9 Q. Well, besides talking to your attorney -- so
10 that's privileged, I don't need to know about that.
11 But I'm just wanting to understand, was there
12 anything else you did to prepare to come and talk to
13 me today?

14 A. No, sir.

15 Q. Okay. Well, I'd like to talk to you a little
16 bit about who you are, kind of get some background,
17 if that's all right?

18 A. Okay.

19 Q. Currently, you're a deputy with the Rockdale
20 County Sheriff's Office, is that right?

21 A. Yes.

22 Q. Okay. When were you first hired by Rockdale
23 County?

24 A. April 2021.

25 Q. Okay. And what was your first position at

Page 6

1 MR. SMITH: That's how I grew up, soft
2 spoken, as well. So it's a learned trait
3 sometimes.

4 MR. SMITH: (Resuming)

5 Q. What else? Have we already talked about --
6 if you need a break at some point, just let me know
7 and we'll be happy to take breaks. You'll still be
8 under oath, you know, when you're on break, but at
9 the same time, we're all going to need to do that at
10 some point, okay?

11 A. Yes, sir. Is that better?

12 Q. All right. Great. Just wanted to start, I
13 don't want to know what you and your attorney talked
14 about at all, but I'm just wanting to understand, how
15 did you prepare for today's deposition?

16 A. I'm sorry?

17 Q. How did you prepare for today's deposition?
18 Let me start with, did you review any videos before
19 coming in today to help you remember what we're going
20 to talk about today?

21 A. No, sir.

22 Q. Okay. Did you review any written documents
23 that were prepared, not by your attorney, but written
24 documents from the Rockdale Sheriff's Office in order
25 to prepare for today's deposition?

Page 8

1 the sheriff's office?

2 A. Detention deputy.

3 Q. And my understanding is that there's a
4 probationary period involved with that position; is
5 that correct?

6 A. Yes, sir.

7 Q. How long is that?

8 A. One year.

9 Q. It's one year? All right. And from your
10 perspective, when you were an officer on probation,
11 how is that period different than when you started
12 working as a detention officer after being on
13 probation?

14 A. I'm not sure what you mean.

15 Q. Well, are you -- are you supervised
16 differently during that probationary period?

17 A. No, sir.

18 Q. Okay. Do you have more performance reviews
19 during that period?

20 A. Yes, sir.

21 Q. Who conducts those?

22 A. Normally the shift lieutenant, supervisors.

23 Q. Are you given different tasks than other
24 officers during that period?

25 A. No, sir.

Page 9

1 Q. And then are you -- are you paired up with
2 anybody who maybe has more experience or something
3 along those lines?

4 A. Yes, sir.

5 Q. Okay. How does that work out? How do they
6 pair you off in that way?

7 A. They have training officers. And so they
8 pair you with training officers during a training
9 period. And then even after you complete the
10 training period, you still are kind of paired with
11 them so they can shadow you.

12 Q. So is the training period shorter than the
13 probationary period?

14 A. Yes.

15 Q. How long is the training period?

16 A. It varies from person-to-person. I'm not
17 sure what the set amount of training period.

18 Q. And for you, who were you paired up with
19 during your training period?

20 A. I had multiple officers. I worked with
21 Deputy Ramirez, Rock, Deputy Rock, Sergeant Hall,
22 different officers.

23 Q. Okay. Sergeant Hall, he was on your regular
24 rotation, is that right?

25 A. Yes.

Page 11

1 A. At the private prison, it was just classroom.
2 It wasn't through Georgia --

3 Q. Okay. Back in May 2024, that's really the
4 time that we're going to be focused on, what was your
5 position at the jail?

6 A. A detention officer.

7 Q. At some point, you became a jail training
8 officer, right?

9 A. Yes.

10 Q. When was that? Do you remember?

11 A. I don't remember the exact date, but I did go
12 to training for it.

13 Q. Was that before or after the incident with
14 Ezra Smith? Do you remember?

15 A. It was before.

16 Q. Was there anyone on your shift that you were
17 responsible for training?

18 A. I've trained a couple people, but, no, I
19 wasn't supervising anymore.

20 Q. Okay. Well, you mentioned before that folks
21 would pair off, and I didn't know if you had someone
22 who was paired with you at that point in time, in May
23 2024?

24 A. No, I'm not -- I'm not sure at the moment.

25 Q. Okay. Did you take on any different duties

Page 10

1 Q. Okay. As it relates to Rockdale County, that
2 wasn't your first law enforcement position; correct?

3 A. No.

4 Q. Where did you work before that?

5 A. I started with the Department of Juvenile
6 Justice as a jail training officer. Not training
7 officer, a jail corrections officer. And then I went
8 to a private prison.

9 Q. Which one?

10 A. Robert A. Deyton Detention Facility.

11 Q. When you were at either of those positions,
12 did you go through the training protocols?

13 A. Yes.

14 Q. Excuse me, with the Georgia Sheriffs
15 Association?

16 A. I'm not sure.

17 Q. Was there some kind of training that you
18 perform in order to become certified as a jailer?

19 A. Yes.

20 Q. And did you go through that at the first
21 position that you had with the Department of Juvenile
22 Justice?

23 A. Yes.

24 Q. Okay. And did you have something comparable
25 when you went to the other facility?

Page 12

1 as a result of becoming a JTO? A jail training
2 officer, pardon me.

3 A. No.

4 Q. I also understand that you were part of the
5 JFIT team. What is that?

6 A. Oh, the JFIT, that is our Jail Facility
7 Incident Team. So we conducted searches, like, mass
8 dorm searches. We were able to carry a taser.

9 Q. Okay. So is this -- you're doing cell
10 checks, essentially? Or not cell checks, but --

11 A. Yes.

12 Q. -- contraband checks? And was that something
13 you were doing at that time in May 2024? Was that
14 one of your responsibilities?

15 A. It's possible we did some searches. I'm
16 sorry. Can I finish?

17 Q. Go ahead.

18 A. So with JFIT, it was in with our current
19 duties. So they would have us come on an off day and
20 just conduct searches.

21 Q. Okay. So you wouldn't be doing that on your
22 regular shift? You would --

23 A. No, I'm sorry.

24 Q. To your best your recollection, who was your
25 supervisor back in May of 2024?

Page 13

1 A. Lieutenant Daniel, Sergeant Hall. I'm not
2 sure who else was on our shift at that time.

3 Q. Let's see if we can just go through the
4 roster. That may be easier to figure out who was
5 doing what.

6 MR. BUCKLEY: Do y'all want to see that
7 before I look at it and before she looks at it?

8 MR. SMITH: I have a second copy I can
9 send down your way.

10 MR. BUCKLEY: Off the record.

11 (Whereupon, a discussion ensued off the
12 record.)

13 (Whereupon, Exhibit Number 1 was marked
14 for purposes of identification.)

15 MR. SMITH: (Resuming)

16 Q. I've shown you what is labeled as Exhibit 1.
17 Do you recognize that particular document?

18 A. Yes.

19 Q. All right. Can you tell me what it is?

20 A. This is the lineup.

21 Q. And the lineup shows us -- how would you
22 explain what the lineup shows us?

23 A. The lineup shows who the shift supervisor is,
24 who's the supervisor in the housing pod, and booking,
25 it gives us the dates, it gives the deputies and

Page 15

1 Looking at this list, who are those folks then?

2 A. The supervisor is Lieutenant Daniel, Sergeant
3 Lickliter, Corporal Hall.

4 Q. Okay. And I see that Sergeant Lickliter was
5 listed as the booking supervisor?

6 A. Yeah.

7 Q. What is the role, I guess, of the booking
8 supervisor in the functioning of a shift?

9 A. I'm not sure. I'm not a supervisor. They're
10 just -- I'm not sure.

11 Q. Well, if you're working as a -- if you're
12 working in booking, what kind of things would you
13 need to go and talk to Sergeant Lickliter about?

14 A. If I'm inputting someone in the system and I
15 have a question about a charge. We also -- they have
16 to look at all releases. So it's -- it's a folder.

17 They go over everything before someone gets released
18 from the facility.

19 Q. And is there anything different that you
20 would go and talk to Corporal Hall or Lieutenant
21 Daniel about while you're on shift and working in
22 booking?

23 A. No.

24 Q. If you're in booking, is Sergeant Lickliter
25 the person you go to first? And then that's the

Page 14

1 their posts.

2 Q. And so, just so I can understand, was this
3 the regular team that you sort of worked with then?
4 These -- this list of folks the regular team that you
5 worked with in July of 2024?

6 A. Yes.

7 Q. Okay. And I apologize. Earlier I asked you
8 a couple of questions related to May 2024, and that's
9 my fault. This happened in July of 2024. And so --
10 too many dates in my head. But I want to make sure
11 the date that we have listed here, July 8, 2024, to
12 the best of your recollection, is that the beginning
13 of the shift in which the incident occurred?

14 A. The incident happened -- it wasn't at the
15 very beginning of the shift, no.

16 Q. Sure. But was this the -- was this the
17 roster for the shift on which it occurred?

18 A. Yes, sir.

19 Q. Okay. So as I understand it then, when we
20 look at this, we can tell where you were posted that
21 evening as well as who else was posted at different
22 parts of the jail; correct?

23 A. Yes, sir.

24 Q. All right. And then -- so you mentioned
25 earlier that you had a couple of supervisors.

Page 16

1 beginning of your chain of command?

2 A. No. That's -- no, sir. Can you ask the
3 question again, please?

4 Q. Yeah. And, sorry, we should have said this
5 earlier. I'm going to ask you questions that are not
6 going to make any sense, in part, because I haven't
7 experienced what you've experienced working there.
8 And so if it doesn't make sense, just ask me to
9 rephrase it, and I'm happy to do that. And if you
10 don't hear me, because I -- if I talk too softly,
11 then just ask me to repeat it. I'm happy to do that
12 too.

13 A. Okay.

14 Q. So I guess what I'm trying to figure out is
15 is, like, what's your chain of command when you're
16 there working in booking at the jail?

17 A. You can go to the lowest ranking, which is
18 Corporal Hall, and if it's another issue, you can
19 just go up the chain of command. If one supervisor
20 isn't available at the time, you could just -- the
21 nearest supervisor, if it's a minor question as far
22 as charges, or just any question that you might have.

23 Q. Now within the other folks who are on shift,
24 is there anyone else who you would defer to or ask
25 questions of as an officer in charge of you if you

Page 17

1 were -- looking at this list -- let me back up
2 because I just added too much in there. Looking at
3 this list, was there any other officer on the list to
4 whom you would ask questions about what you're
5 supposed to do as a booking -- as a booking officer
6 on the shift?

7 A. Are you asking me, is there anyone I would
8 ask for advice to handle a situation on the shift?

9 Q. Yeah.

10 A. I would ask all my coworkers if it's
11 something I haven't experienced before.

12 Q. And at this point in time in 2024, were you
13 considered -- well -- did you consider yourself one
14 of the more experienced officers?

15 A. No. No, sir.

16 Q. Okay. At this point, you were training other
17 officers, though, right?

18 A. Yes.

19 Q. Okay. And so, being a trainer, are you
20 someone that other less experienced officers would
21 look up to?

22 A. Yes.

23 Q. All right. Now my understanding is, from
24 looking at this, you were initially assigned to
25 kitchen duty, but then were told to report to

Page 19

1 her while she goes from cell to cell.

2 Q. Was there a particular deputy that would be
3 assigned to the nurse?

4 A. No.

5 Q. I forgot to ask you, I'm sorry, how long were
6 you at the Department of Juvenile Justice?

7 A. I don't even believe it was six months.

8 Q. Okay. And how about the private facility?

9 A. The private facility, I believe, three years.

10 Q. Was that your immediate position before
11 coming to Rockdale?

12 A. Yes.

13 Q. Okay. What made you decide to leave the
14 private facility?

15 A. Safety.

16 Q. You're now a deputy, when did you make that
17 transition from a correctional officer in the jail to
18 a deputy?

19 A. August of 2024. Not August, October, I'm
20 sorry.

21 Q. 2024?

22 A. Yes.

23 Q. Okay. In and around July of 2024, were you
24 already taking the mandated courses?

25 A. No.

Page 18

1 booking; is that correct?

2 A. Yes, sir.

3 Q. On the night shift, when does kitchen duty --
4 like -- what does kitchen duty entail?

5 A. Kitchen deputies, we get the inmate workers,
6 and we go to the kitchen and we assist our -- staff
7 prepare the food for the facility. I just supervise
8 the inmates in the kitchen.

9 Q. Is the kitchen open when you come on shift as
10 a night shift -- for the night shift?

11 A. No.

12 Q. When does the kitchen reopen?

13 A. I no longer work in the kitchen, and I know
14 it's changed. I believe the time was two o'clock.

15 Q. All right. You know, there are certain
16 things that happen with some regularity within the
17 day shift, like, pill call, you know, those kind of
18 daily activities. Is there a pill call during the
19 night shift, as well?

20 A. Yes.

21 Q. What time was that normally?

22 A. It varies. There's no set time.

23 Q. And who conducts pill call in booking,
24 specifically?

25 A. The booking nurse and a deputy standing with

Page 20

1 Q. And just because I don't know how Rockdale
2 sets this -- sets this up, when is your shift -- as a
3 night shift -- when you're working night shift, like,
4 what did your shift go from and to?

5 A. 6:00 p.m. to 6:00 a.m.

6 Q. And when are you required to report for your
7 shift?

8 A. Briefing starts at 5:45 p.m.

9 Q. And that's your -- who conducts your
10 pre-shift briefing normally?

11 A. Lieutenant.

12 Q. Coming in before the night of the incident
13 that occurred with Ezra Smith, was there anything in
14 the pre-shift briefing that you can recall?

15 A. No, sir.

16 Q. Was it normal for you as being listed as the
17 kitchen staff to spend your time in booking during
18 your shift?

19 A. Yes, sir.

20 Q. Besides that briefing meeting, is there any
21 other way that you would learn about what was
22 happening on the prior shift when you're coming onto
23 shift?

24 A. When you report to your post, you conduct,
25 like, a pass on. That's it.

Page 21

1 Q. Who do you conduct the pass on with?
 2 A. The previous deputy that was on that post.
 3 Q. And that's just oral?
 4 A. Yes.
 5 Q. In booking, is there any kind of other
 6 written log that you would consult?
 7 A. No, sir.
 8 Q. I understand that on night shift, each deputy
 9 gets a meal period, is that right? Like, a meal
 10 break?
 11 A. Yes, you can request one.
 12 Q. Okay. So -- but it wasn't -- you didn't
 13 have -- you wouldn't necessarily go on break?
 14 A. You can just request -- if you need a break,
 15 someone will come relieve you and you take a break.
 16 Q. So that's not at a set time then?
 17 A. No, sir.
 18 Q. All right. Okay. Based on your interactions
 19 with your -- with your commanding staff or your
 20 supervising staff, how would you -- how would you say
 21 they thought of your performance as a jail officer?
 22 MR. BUCKLEY: Object to the form of the
 23 question. You may answer. I'm just stating a
 24 legal objection. I'm not directing you not to
 25 answer. You can answer his question.

Page 22

1 THE WITNESS: Okay. What was your
 2 question?
 3 MR. SMITH: (Resuming)
 4 Q. That's a good question because I always
 5 forget them after that too. No, based on your
 6 interactions with your supervising officers, what
 7 would you say that their impression of your work as a
 8 jail -- as a corrections officer was?
 9 MR. BUCKLEY: Same objection. Go ahead.
 10 THE WITNESS: I believe they think I'm a
 11 good officer.
 12 MR. SMITH: (Resuming)
 13 Q. You were there basically three years, right?
 14 A. Yes.
 15 Q. Is that a -- I mean, in your experience with
 16 other officers, are most folks there a shorter or
 17 longer time than you before going on to uniform
 18 service?
 19 A. It depends on them individually. I applied
 20 to go to uniform. I went to school for it.
 21 Q. Do you remember getting positive feedback in
 22 your -- in your reviews with your supervising
 23 officers?
 24 A. Yes.
 25 Q. And did you have any disciplinary actions

Page 23

1 against you when you were a corrections officer?
 2 A. No, sir.
 3 Q. As part of that -- in your review process,
 4 there's a -- there's a forward looking aspect, right?
 5 Like, what you're going to do with your future?
 6 A. We do a career path. So, yes.
 7 Q. When you were doing your career path with
 8 your supervisors there at Rockdale County, what were
 9 they encouraging you to do?
 10 A. So I told them I would like to become a
 11 mandated officer. And so my supervisor, he went over
 12 and told me to apply for mandate.
 13 Q. Did you receive any awards or accolades,
 14 like, while you were a corrections officer?
 15 A. I found a phone. And so -- I'm not sure what
 16 it's called, but I was praised for finding a phone
 17 inside the jail.
 18 Q. A contraband phone?
 19 COURT REPORTER: Just an audible "yes".
 20 THE WITNESS: Oh, yes, I'm sorry.
 21 MR. SMITH: (Resuming)
 22 Q. I do it all the time, too. At one point,
 23 were you nominated for jailer of the year or
 24 something like that?
 25 A. I don't think so. I don't know. I haven't

Page 24

1 won deputy of the year.
 2 Q. All right. Well, let me turn a little bit to
 3 just to kind of get an additional sense of, like, the
 4 process that you were working with when you were
 5 working in booking. Just briefly, what's the process
 6 that a person goes through to get booked into the
 7 jail from the point at which an officer brings them
 8 to the sally port door?
 9 A. You start at the sally port and you do a pat
 10 search for any contraband. We fill out a jail card,
 11 as well. You are placed inside a tech 84 machine,
 12 which does -- it's, like, a scan to see -- make sure
 13 you don't have any contraband before you're being
 14 dressed out. An officer does a visual search while
 15 you're getting dressed, and we offer you a shower.
 16 And then once we put all of your belongings inside of
 17 a property bag, we put you inside of a cell, that's a
 18 holding cell, and you're then inputted into the
 19 system.
 20 Q. At any point up until the point that you're
 21 put into the holding cell, are you seen by a medical
 22 personnel?
 23 A. Yes. I apologize, I did forget that step.
 24 When you are first -- before the officer who brought
 25 you in, that you have to be screened by medical at

Page 25

1 that moment before they can leave, sorry.

2 Q. You're fine. I assume that Rockdale is big
3 enough, there's more than one nurse on staff usually
4 at any given point in time, is that right?

5 A. Yes.

6 Q. So is there a nurse assigned to a particular
7 station that does that screening?

8 A. We have a booking nurse. If she's
9 unavailable, we can call the nursing station and a
10 nurse can come and screen.

11 Q. Besides that initial screen that happens
12 around -- it sounds like it happens right after the
13 sally port?

14 A. No. Yes. So -- I'm so sorry. I'm confusing
15 myself. When you come in, when the officer drops you
16 off on a warrant or affidavit, the booking nurse,
17 before the officer can leave, has to screen them to
18 make sure that they weren't in, like, an accident, a
19 car accident.

20 Q. Would it be fair to say that the purpose of
21 the screening is to ensure that they can be admitted?
22 And if they have a health problem that requires them
23 to get attention that they are not admitted and then
24 sent to the hospital?

25 A. Yes.

Page 27

1 the folks who are going through the administrative
2 process of booking are in the booking cells; correct?

3 A. Yes. We -- they're holding cells.

4 Q. And then there's also a special population
5 within the booking area for folks who might have
6 additional needs, medical or otherwise?

7 A. Yes.

8 Q. Separately, there's a medical area where
9 there might be cells too?

10 A. That is -- yes, sir.

11 Q. Okay. Within the context of the special
12 housing that's located in booking, are there specific
13 cells for folks who are at risk of committing
14 suicide?

15 A. There are two suicide cells.

16 Q. What distinguishes suicide cells from other
17 holding cells? Or other cells within the booking
18 area?

19 A. They are padded cells. There's no -- it's --
20 it's a room -- it's a cell -- it's padded and there's
21 no toilets in the cell.

22 Q. Are there other features of those cells that
23 are different from the other booking cells?

24 A. Yes. In the padded cell, there's no bed, as
25 well. No -- there's no bedding.

Page 26

1 Q. Where else within the booking process do you
2 interact with the nurse?

3 A. The nurse -- while we're booking you in, the
4 nurse will pull you for a screening before you're
5 admitted to go to general population.

6 Q. All right. And this is helpful for folks,
7 maybe who, you know, don't -- you know -- don't have
8 a lot of experience in the jail. Booking is separate
9 from general population; is that correct?

10 A. I'm sorry. Ask that question again.

11 Q. That's a good -- good read. I'm just trying
12 to understand if someone hadn't been to the jail
13 before, how would you describe the difference between
14 booking and general population?

15 A. Booking is administrative. This is
16 administrative. So that is where we do all of our
17 administrative work. But booking also houses -- it's
18 special housing, as well, is what they call that one.
19 So if you need medical, like, detox, you'll be housed
20 in booking or medical.

21 Q. You said booking or, what was the last
22 reason?

23 A. Medical.

24 Q. Medical? Okay. So that's helpful for me,
25 just not being familiar. So then, just to summarize,

Page 28

1 Q. Okay. So there's no toilet, there's no bed.
2 Is there a camera within the cell?

3 A. Yes. There's cameras in all the cells in
4 booking.

5 Q. Okay. So that's a -- that's a booking wide
6 feature?

7 A. Yes.

8 Q. Are there phones in all the cells?

9 A. No.

10 Q. Which cells have phones?

11 A. The holding cells have phones. There are
12 five cells in booking that have phones.

13 Q. Separate and apart from the phones, there's
14 an intercom system?

15 A. Yes.

16 Q. Can you describe what these two things --
17 where they're located within cells and what they look
18 like?

19 A. There's an intercom in every cell in booking.

20 Q. And where within the cell is that located?

21 A. On the wall. It's just a -- it looks like a
22 light switch right there. You can just press a
23 button and it will connect you to an operator -- to a
24 deputy.

25 Q. And where is that deputy located?

Page 29

1 A. In booking on the platform.
 2 Q. The phones -- the cells that have phones,
 3 where are those phones located within the cells?
 4 A. The phones are located on the wall.
 5 Q. And can you describe what the phones look
 6 like?
 7 A. They look like old pay phones. But, of
 8 course, you don't put any money. It's silver. It
 9 has a cord, as well. So, like, they can't rip the
 10 wires out. It's, like, a metal cord.
 11 Q. So there's something -- there's a piece of
 12 metal that covers the cord between the receiver and
 13 the box?
 14 A. Yes.
 15 Q. Does it have, like, any sort of display on
 16 it?
 17 A. I'm not sure.
 18 Q. And you said there's six cells within booking
 19 that have those?
 20 A. There are five cells in booking that have
 21 phones.
 22 Q. Okay. Thank you. You may have said that the
 23 first time, and I just mixed up the numbers.
 24 However, the suicide cells don't have phones?
 25 A. No, sir.

Page 30

1 Q. Do they have intercoms?
 2 A. Yes.
 3 Q. Okay. So all the cells have intercoms?
 4 A. Yes.
 5 Q. Got it. I have some videos that we can take
 6 a look at in a minute. But I just want to get sort
 7 of a layout in terms of what's the shape of the
 8 booking area. How would you describe its shape to
 9 someone who hadn't been there before?
 10 A. It really depends on how you're looking at
 11 it, from what angle.
 12 Q. Okay. Let's say, if we're going to look at
 13 it top down, how would you describe it?
 14 A. Like a v shape.
 15 Q. V as in Victor?
 16 A. Yes.
 17 Q. And you mentioned a platform, where is the
 18 platform situated in the v shape?
 19 A. I'm sorry. So the platform will be right
 20 here.
 21 Q. Is that the center of the v?
 22 A. Yes.
 23 Q. Okay. So from the platform, you can see the
 24 cells on both sides?
 25 A. Yes.

Page 31

1 Q. Are there different stations on the platform
 2 that you work at?
 3 A. Yes.
 4 Q. What are those?
 5 A. So the booking platform also you can go to
 6 the transport side and that's where the GCIC computer
 7 is located.
 8 Q. And so there's two separate sides?
 9 A. Yes.
 10 Q. What happens at the transport side?
 11 A. On the transport side, there are cells for
 12 special housing and a GCIC computer is located on the
 13 platform right there.
 14 Q. And what's the other side? How would you
 15 describe what happens on the other side of the
 16 platform?
 17 A. I don't understand. What do you mean?
 18 A. Well, I'm just trying to -- it sounded like
 19 the transfer side was also the side where the GCIC
 20 computer is?
 21 A. Yes, it's a GCIC computer.
 22 Q. Okay. So on the other side of the platform,
 23 what work are you doing on that side when you're over
 24 there?
 25 A. Are you asking me, what work am I doing on

Page 32

1 the transport side?
 2 Q. No, the opposite side.
 3 A. Those are where the booking computers are.
 4 Q. Okay. Is it, like, two banks of computers
 5 then essentially?
 6 A. Yes. Well, it's only one GCIC computer.
 7 Q. Let me just pull up a couple things. I'm
 8 just going to -- this is just for me. We're not
 9 going to mark these exhibits. I want to make sure
 10 that I have a sense of where this stuff all is.
 11 Okay. All right. Sorry. Okay. I'm showing you
 12 this screen here. This is the booking area, right?
 13 A. Yes.
 14 Q. Okay. And the left hand side here, that's
 15 the platform?
 16 A. Yes.
 17 Q. What's -- what's happening on -- what work do
 18 you do on this side of the platform that's closest to
 19 where the camera is? And if you can't see it, you
 20 let me know.
 21 A. So on -- are you asking me what am I doing
 22 here?
 23 Q. Yes, ma'am. On the near side.
 24 A. There are no computers there. If there's
 25 a -- there's a camera -- I'm sorry -- there's a

Page 33

1 camera off to the side from right there on the wall
2 that you can see. But as far as right here --

3 Q. Yeah.

4 A. -- I'm not working right here.

5 Q. Okay. So no one -- no one's using that
6 portion of the -- of the booking area typically?

7 A. No.

8 Q. All right. So that will take me to number
9 two. Do you see that?

10 A. Yes.

11 Q. Okay. So this is the opposite side of the
12 platform?

13 A. Yes.

14 Q. Okay. This bank of computers that we see
15 here, is that where you have the GCIC computer?

16 A. No.

17 Q. Oh, okay. What's there then?

18 A. Those are booking computers.

19 Q. Those are booking computers? So if I were
20 looking for the GCIC computer, where would I look for
21 that?

22 A. It's not on the camera.

23 Q. Okay. That's helpful. One more then.

24 MR. BUCKLEY: It's sort of hard to --
25 there's a lot of here, there, over there. I

Page 35

1 It's just forms in that box.

2 Q. Okay. Is -- from this angle, or this point
3 of view, if you're looking for the GCIC computer,
4 would you look to your left or to your right?

5 A. To my right.

6 Q. Okay. It's about as far right as I can go, I
7 think.

8 A. The camera -- so you're looking -- this is
9 still the booking platform?

10 Q. Correct.

11 A. Where you see stairs off to your right?

12 Q. Okay.

13 A. There's a desk in it that's houses two
14 computers right there. One is the GCIC computer.

15 Q. Okay. So you're saying it's beyond the
16 little kitchenette area there? Or wherever that is?

17 A. Yes.

18 Q. Which is -- for purposes of this, it's on the
19 right hand side of my screen in the mid section
20 there. Okay. Got it. Okay. From the GCIC section
21 of the jail, what are you able to see?

22 A. Transport side.

23 Q. The transport side of the booking area?

24 A. Yes.

25 Q. We're going to have to have her -- I think

Page 34

1 don't know if the record will really --

2 MR. SMITH: Oh, yeah. No, that's fine.
3 We can go ahead and we can get something more
4 formalized so we have things played out. For
5 right now, I'm just trying to make sure I
6 understand.

7 MR. BUCKLEY: If you'll just say, like,
8 the left side of my screen, or something like
9 that.

10 MR. SMITH: Absolutely.

11 MR. BUCKLEY: She's saying, there, here.

12 MR. SMITH: (Resuming)

13 Q. Okay. I'm going to show you one more here
14 just so that way I have a sense. So I'm showing you
15 a still -- sorry. Okay. Do you recognize the area
16 that's depicted here?

17 A. That's the booking platform.

18 Q. Okay. Now, in the visual field that we have,
19 can you point to where the GCIC computer might be?

20 A. It's not on the camera.

21 Q. It's still not on the camera? Okay. Where
22 this key, which is on the near side and the right
23 side of my screen, where the keys are hanging, what
24 is this area called?

25 A. We just -- it's just the booking platform.

Page 36

1 draw this because I am absolutely befuddled. So do
2 you -- can I give you a piece of paper? I apologize
3 for the ridges. Do you have a pen? Okay. Can you
4 outline, like, the shape of the booking area and then
5 where the GCIC is versus the booking computers?

6 A. Sorry, I'm not an artist.

7 Q. Well, every artist starts somewhere.

8 A. Oh, damn, I'm so sorry. I'm just doing the
9 transport side. I'm so sorry.

10 Q. You don't have to be. Do whatever you have
11 there, and then explain it to me, and then we'll --
12 we'll get the next part. Okay, let's take a look.
13 We'll mark this as 2.

14 (Whereupon, Exhibit Number 2 was marked
15 for purposes of identification.)

16 MR. SMITH: (Resuming)

17 Q. All right. So on this, which cells are the
18 ones you're listing here? What are their numbers?
19 Do you remember?

20 A. I do not.

21 Q. Okay. And where the GCIC is, that's part of
22 the booking platform still; correct?

23 A. Yes.

24 Q. All right.

25 A. This was supposed to be a wall.

Page 37

1 Q. Okay. So --

2 A. That goes that way. Where you have the
3 angle, that is showing this because that's the
4 kitchenette.

5 Q. Okay. Well, let's mark that on there just so
6 that way we have a way of, sort of, orienting
7 ourselves to it.

8 A. These cells will be called transport cells.

9 Q. Okay.

10 A. I just do not know the number.

11 Q. And transport cells, are those for folks who
12 are waiting to be picked up by other jurisdictions?

13 A. They're special housing cells, as well.

14 Q. Okay. Are any of the padded cells on that
15 side?

16 A. No.

17 Q. Okay.

18 MR. BUCKLEY: Can I make a request? She
19 talked about a wall when she was testifying.

20 Can you get her to write, wall, that she was
21 talking about, please?

22 MR. SMITH: Yes.

23 MR. BUCKLEY: Thank you.

24 MR. SMITH: (Resuming)

25 Q. All right. Now, my understanding is that

Page 38

1 most of what we're focused on is holding cell seven,
2 which is not pictured in this; correct?

3 A. No.

4 Q. All right. This is good. Do you mind doing
5 another one where we would see where holding cell
6 seven is?

7 A. Okay.

8 Q. I can give you a fresh piece of paper too.
9 So that way we're not duplicating.

10 MR. BUCKLEY: Is the one you just did
11 going to be 2?

12 MR. SMITH: Yes. I'll label this 3.

13 (Whereupon, Exhibit Number 3 was marked
14 for purposes of identification.)

15 MR. SMITH: (Resuming)

16 Q. Okay. So help me see some of this stuff. So
17 as I understand it, we're looking at Exhibit 3. The
18 booking platform is prominent in the center. On the
19 extreme right side past the sally port, it looks
20 like, is the -- or the hallway to the sally port, is
21 the nurse's station?

22 A. Yes, the nurses station.

23 Q. And that's the booking nurse?

24 A. Yes.

25 Q. Okay. If I was looking for holding cell

Page 39

1 seven, where would I look?

2 A. This would be holding cell seven.

3 Q. Okay. So on the corner --

4 A. It's how I drew it. I'm sorry.

5 Q. That's fine. Can you just put that on there
6 for me? So that way -- thank you. All right.

7 Excellent. Thank you so much. Oh, that's confusing
8 putting cell 15 all the way over there. All right.

9 My next question, on the booking platform here that
10 we're looking at, there's two sides to it that face
11 cells eight through 14, and there's a side that faces
12 one through seven. What stations are on the one
13 through seven side?

14 A. I'm not understanding what you mean.

15 Q. Okay. So I understood before there were
16 booking computers?

17 A. Yes.

18 Q. Where are those located on this platform?

19 A. I have to put another wall.

20 Q. Okay. It's what happens with all
21 construction. It starts out simple, you add things
22 all the time.

23 A. I'm not sure how many computers there were.

24 Q. I don't need to know how many. Just
25 generally, where they're located. Now, on the side

Page 40

1 that we're looking at here, the side that faces cells
2 eight through 14, what is on that side of the booking
3 platform?

4 A. There isn't nothing.

5 Q. Okay. If we were going to put these two
6 pictures, Exhibits 2 and 3 together, how would
7 they -- how would they fit together?

8 A. I'm sorry.

9 Q. No, you don't have to be sorry.

10 A. So the platform is -- there's another wall.

11 Q. Go ahead and draw the wall. It's fine.

12 A. Sorry.

13 Q. Okay. And this wall, just to make sure that
14 I'm understanding, the one that -- so the GCIC looks
15 to be encased by an L shaped wall, is that right?

16 A. No, I didn't mean to. This isn't a wall.

17 Q. Oh, that's not a wall? Okay. What is that?

18 A. That will probably be -- because it goes --
19 like -- the kitchenette is over here. I guess you
20 could say these are steps.

21 Q. Okay. So when you said from GCIC you can see
22 transport, does that mean you can see into, like,
23 where the sally port is?

24 A. No.

25 Q. Okay. You can just see these cells over here

Page 41

1 marked 12, 13, 14?

2 A. You can't. You have to get up.

3 Q. You have to get up? All right. Got it.

4 A. Yeah, it's a distance.

5 Q. Yeah, that's right. We didn't do a scale or
6 anything like that. That's fine. Okay. What is --
7 let's back up. So we talked -- you talked generally
8 about the process, and I thank you for doing exhibits
9 2 and 3. This is very helpful for me to sort of
10 orientate myself to the physical location because the
11 cameras distort things a little bit. What part of
12 the booking process is a person entered into your
13 computer system?

14 A. Are you asking me, when do we input them into
15 the system?

16 Q. Yeah. In the -- in the process, when do you
17 input the person into the system?

18 A. When we place them in the holding cell, you
19 come to your booking computer and you start going
20 over all their paperwork. And that is when you input
21 their basic information into the system.

22 Q. What paperwork are you going over?

23 A. Affidavit, warrants, the reason they're
24 there.

25 Q. And if I'm understanding this correctly, this

Page 43

1 A. Yes.

2 Q. Once you have the folder, what do you do
3 next?

4 A. You start putting them in the system.

5 Q. Where are the folders maintained?

6 A. In booking on the platform.

7 Q. Is there, like, a -- is there a place that
8 you stick the folders?

9 A. On that camera footage that you showed me, it
10 actually shows where the folders are stored.

11 MR. BUCKLEY: Can you show that picture
12 again? Sorry.

13 MR. SMITH: Yeah, I'm coming around to
14 it. I had to find it. So we'll take a
15 screenshot of this. How about that? And we'll
16 call it Exhibit 4, and we'll pass it around.
17 That will be easier once we get to the place you
18 want me to stop.

19 (Whereupon, Exhibit Number 4 was marked
20 for purposes of identification.)

21 MR. SMITH: (Resuming)

22 Q. Is this the picture you're talking about?

23 A. Yes.

24 MR. SMITH: Everybody -- I'll send it.
25 I'll send a picture around.

Page 42

1 is given to you in some kind of file, is that right?

2 A. No. When you come over -- you only have a
3 card once you put them in the holding cell. Once you
4 get on the booking platform, you make a folder for
5 that person.

6 Q. Okay. So person comes from where they've
7 changed out into their orange uniform, they're placed
8 into the holding cell, and you have a card with
9 their -- what's on the card?

10 A. Basic information, name, date of birth,
11 emergency contact, if they give it to us, general
12 description. Also on the back of the card, it has
13 their property.

14 Q. Oh, so it identifies the bag in which their
15 property is located?

16 A. No. It tells us, like, you have on a gray
17 jacket, a white shirt, everything that we -- that you
18 give us, we itemize it on that card.

19 Q. Okay. So this card, is it a full
20 eight-and-a-half by eleven sheet of paper?

21 A. I'm not sure. It's not -- no.

22 Q. Okay. But on the back, it has a list where
23 you itemize property?

24 A. Yes.

25 Q. You take the card and then you make a folder?

Page 44

1 MR. SMITH: (Resuming)

2 Q. Okay. So in what we're going to now call?
3 Exhibit 4, the screenshot of this still from -- let's
4 see -- this is from 20240709 at 1:34 a.m. It is --
5 body camera three with an X designation afterwards.
6 I will tell you that when we got this film, it was
7 labeled Jackson, just so you know. So in this -- in
8 this frame, where are the folders kept?

9 A. Right there.

10 Q. Can you describe the -- what you're pointing
11 at?

12 A. The filing system, it dips down. No -- right
13 there in the middle.

14 Q. Okay. Sorry. So let me see if I can -- so
15 on the other side -- on the right hand side of where
16 the keys are being held, there is a system of folders
17 in between two other, I don't know what you call
18 those, bookcases, or something like that, where you
19 drop files into?

20 A. Yes.

21 Q. Okay.

22 MR. BUCKLEY: Where?

23 MR. SMITH: It's right here.

24 MR. BUCKLEY: Oh, okay. In the middle
25 of that table?

Page 45

1 MR. SMITH: There we go.
 2 MR. SMITH: (Resuming)
 3 Q. So that's where you put the folder before you
 4 work it?
 5 A. No, that's where you put the folder once
 6 they're going to general population if they do not --
 7 if they're not waiting for a warrant.
 8 Q. Okay. So before it makes its way there,
 9 where does it stay?
 10 A. I'm sorry. This ledge right here in front of
 11 those -- that bookcase, you can have a stack right
 12 there. The person passing it on to you, they can
 13 say, hey, we need to work on these folders. They'll
 14 give it to you. There's no necessarily specific
 15 place where everything's supposed to be.
 16 Q. Okay. But if you were looking for a folder
 17 that had not yet been practiced, you would look to
 18 the left of where those keys are on the table in
 19 front of it --
 20 A. Yes.
 21 Q. -- of that bookcase? Okay. All right. And
 22 just, finally, on -- as it relates to folders, do you
 23 use different color folders for different -- for
 24 different things?
 25 A. Yes.

Page 46

1 Q. Okay. What's the color code system?
 2 A. I do not remember it.
 3 Q. Okay. That's fine. Do you remember what
 4 blue folders were for?
 5 A. I do not.
 6 Q. That's fine too. All right. Now, at some
 7 point, after the person's put into the cell, and
 8 before they go to general population, they see the
 9 nurse; correct?
 10 A. Yes.
 11 Q. All right. At what point does that happen in
 12 what we've talked about so far?
 13 A. It depends on the nurse.
 14 Q. Are there occasions during which a nurse
 15 would see an inmate before you put their folder
 16 information into the computer?
 17 A. Are you asking -- ask that question again.
 18 Q. Yeah. So we just talked about the fact that
 19 you get a card when you put a person into the holding
 20 cell, right? And then you take the card back, you
 21 make a folder. But the folder is what you input into
 22 the computer; is that correct? More or less?
 23 A. Yes.
 24 Q. All right. In between having created a
 25 folder and entering it into the computer, is that a

Page 47

1 time at which the nurse would see inmates?
 2 A. If there's an emergency.
 3 Q. Okay. Any other reason besides an emergency?
 4 A. Not necessarily, no, sir.
 5 Q. Ordinarily, if there's not an emergency, when
 6 would the nurse see someone in this process?
 7 A. The nurse will ask. She will say, hey, I
 8 need to see a person. We pull them out, she sees
 9 them.
 10 Q. Do you provide any information about the
 11 folks you've booked in to the nurse so that she knows
 12 who's there?
 13 A. I'm not sure how they get their list. I
 14 don't know their system.
 15 Q. Okay. So -- but you're not personally as an
 16 officer required to go schlep something over to --
 17 A. No.
 18 Q. Let's see.
 19 MR. BUCKLEY: Do you need a break or
 20 anything?
 21 MR. SMITH: I'm getting close to wanting
 22 one myself. So we'll take a second here.
 23 MR. SMITH: (Resuming)
 24 Q. On the shift, we talked about different roles
 25 already. Generally speaking, what are the

Page 48

1 responsibilities, as you understood them to be, for a
 2 booking officer on the night shift?
 3 A. Are you asking me for my booking duties?
 4 Q. Yes, ma'am.
 5 A. Process, put inmates into the system, release
 6 inmates that need to be released, you have to -- the
 7 special housing inmates that are housed in booking,
 8 you have to see if they would like a rotation, which
 9 means they come out of their cell for an hour to get
 10 a shower, to use the phone, you conduct pill call.
 11 Q. Let me -- well, first, I should make sure, is
 12 that -- do you have anything else you wanted to add
 13 to that list?
 14 A. There are a lot of duties for the booking.
 15 I'll be sitting here talking for a long time.
 16 Q. Well it's going to feel like that anyway,
 17 probably. But versus someone who's working as a
 18 housing deputy, do you have --
 19 A. The only thing separate from a housing deputy
 20 would be, like, booking someone and releasing them.
 21 Q. Okay. Now I saw on there, if I'm correct,
 22 that there is something called, like, a rover?
 23 A. Yes.
 24 Q. What does a rover do?
 25 A. Assist wherever you're needed.

Page 49

1 Q. So that person is not necessarily going to be
2 in booking, for example?

3 A. No.

4 Q. As it relates to who is assigned to booking,
5 specifically, how many booking officers are there
6 usually?

7 A. One, on a good day, two.

8 Q. And there's also a movement deputy, is that
9 right?

10 A. Yes.

11 Q. And what does a movement deputy do?

12 A. It's the same as the role for a deputy. You
13 just assist wherever you're needed. If someone in
14 the housing pods need someone to go to medical or to
15 booking, you are responsible for going to pick them
16 up and escort them down.

17 Q. Okay. So they facilitate the transport of
18 inmates within the -- within the facility?

19 A. Yes.

20 Q. Does the rover do that, as well?

21 A. Which rover are you talking about?

22 Q. Well there's a specific rover position;
23 correct?

24 A. So you have ISD rover and then you have
25 security rover movement.

Page 51

1 shows cameras.

2 Q. Like a large television screen?

3 A. Yes.

4 Q. Okay. And so that's the wall that's next to
5 the kitchenette?

6 A. This is a bad picture. But the kitchenette
7 is over here. I'm sorry. This is a bad picture.

8 There's a wall along the back part of the booking
9 platform where it's a computer where you open doors
10 and a screen where you can view cameras.

11 Q. All right. And so that's -- is that a --
12 that sounds like a control station to me, is that
13 what that is?

14 A. Yes.

15 Q. Does someone sit there the whole time?

16 A. No.

17 Q. Okay. Who typically sits there?

18 A. No one.

19 Q. All right. So when you need to open -- when
20 you need to open a door using -- is it an electronic
21 key lock? Is that what they control?

22 A. It's a computer.

23 Q. Which doors does it control though?

24 A. Booking. Booking cell doors.

25 Q. Okay. So that can be operated either from a

Page 50

1 Q. So what's the difference between those two
2 positions as you experienced them?

3 A. ISD rover, you're primarily in ISD, but you
4 can help out anywhere. Movement security rover, it's
5 the same position because any rover can do the
6 movement. It's just you're doing the annex, which is
7 another part of the jail.

8 Q. Okay. And then you'll have to tell me,
9 because I'm just not familiar with the term, what is
10 ISD?

11 A. Inmate Security Deputy.

12 Q. All right. Are they -- are the inmate
13 security deputy rovers located in a particular part
14 of the jail typically?

15 A. The housing pods where ISD is located.

16 Q. All right. That's helpful. So ISD refers to
17 where general population is?

18 A. Yes.

19 Q. As it relates to the -- you said that all of
20 the cells within the booking area had cameras. Where
21 are those cameras viewed from?

22 A. May I show you?

23 Q. Please. I have Exhibits 3 and 2 ready to go.

24 A. Along this wall, there's a computer to where
25 you can operate doors. There's also a screen that

Page 52

1 computer or using a physical key?

2 A. Yes.

3 Q. All right. So just to jump back to make
4 sure. We talked about where those are located. No
5 one has the particular job, though, of monitoring
6 those cameras?

7 A. No, sir.

8 Q. Would it be the case then that every booking
9 officer is involved with doing count in the booking
10 area?

11 A. I'm sorry, count?

12 Q. Head count?

13 A. Yes. When you first come on shift, you
14 conduct a head count.

15 Q. And are booking officers also responsible for
16 doing the wellness checks within the booking area?

17 A. Yes.

18 Q. Now, you said, when you come on shift, you do
19 a count. There are other counts during the course of
20 the night, right?

21 A. Yes, there is. I'm not sure at the time, but
22 there is another count.

23 Q. All right. Well, let's take -- we've been
24 here for a little over an hour now. Let's just take
25 a quick break because I would like to go use the

Page 53

1 restroom myself.

2 (Whereupon, a break was taken.)

3 MR. SMITH: (Resuming)

4 Q. Just wanted to go back real quick before we
5 sort of talk about the night there. In the Exhibits
6 2 and 3, the drawings that you made, my understanding
7 is that there is a station somewhere where someone is
8 able to answer a telephone with outside calls; is
9 that correct?

10 A. That's at the computers.

11 Q. Okay. So there is a telephone that people
12 can call into, and that's located by the computer
13 bank that faces cells one through seven?

14 A. Yes.

15 Q. All right. Thank you. All right. I want to
16 talk to you about that night and what happened before
17 the point which Mr. Smith attempted suicide. We
18 already talked a little bit about, you know, when you
19 come on to shift and doing the pre-shift meeting,
20 when you report to booking, where do you typically
21 go?

22 A. I go to the platform. As kitchen, I talk to
23 the kitchen deputy that was on the previous shift,
24 and she will let me know if I have any inmates still
25 in kitchen. Then I will report to the kitchen.

Page 55

1 Q. And that would be different than someone who
2 is going to be transferred to another -- to another
3 law enforcement agency?

4 A. No, they still need ATW.

5 Q. Okay. So if someone was getting sent over to
6 Newton County, or if someone is going home that
7 night, they're both going to be ATW?

8 A. Yes.

9 Q. You know, we didn't talk about it before. Is
10 the process -- what's the process like for processing
11 an ATW?

12 A. The process to release someone, you first run
13 their name in GCIC to see if they have any holds.
14 Once you get all of that paperwork, you go over their
15 folder to see if they have -- they've satisfied their
16 charges for Rockdale. You have the person come down,
17 they have to sign just various different paperwork
18 depending on the reason they're being released. And
19 they dress out. If they have no holds and all their
20 paperwork is good, they dress out into their property
21 that they came in with and wait for a supervisor to
22 say they're good to leave.

23 Q. Do you review the GCIC as well when someone's
24 coming in to the facility?

25 A. Yes.

Page 54

1 Q. That night, do you remember if you had any
2 inmates in kitchen? I didn't --

3 A. I did not.

4 Q. Okay. So you went straight to booking then
5 after that?

6 A. Yes.

7 Q. And once you got into booking that night,
8 what did you start doing?

9 A. I remember that night was chaotic. It was
10 very busy.

11 Q. Well, let me -- do you know why it was so
12 busy?

13 A. I do not know why it was so busy.

14 Q. How is it busy? Like, what -- what was
15 happening?

16 A. The men in cell seven, it was -- it was more
17 than four men in seven. And so I knew it was going
18 to be a busy night.

19 Q. There was something that I had seen popped up
20 in different places called ATW, what is that?

21 A. All the way. Those are releases.

22 Q. Okay. So if someone had an ATW, that would
23 mean that, that person was about to be released from
24 the -- released from the jail?

25 A. Yes.

Page 56

1 Q. All right. So within the booking area that
2 night, how many different people were working in
3 booking?

4 A. I do not remember. It was very busy.

5 Q. Do you remember specifically what tasks you
6 were supposed to be working on when you got on shift
7 that evening?

8 A. No, sir.

9 Q. On a normal shift when you're coming into
10 booking, how are you to know what to prioritize in
11 terms of the work you have to do?

12 A. The supervisor will let us know.

13 Q. You mentioned there were three -- there were
14 three supervisors. So which supervisor will tell you
15 that?

16 A. Whichever supervisor is in booking at that
17 time. They'll say, hey, we have three ATWs, let's
18 get them out of here.

19 Q. Do you remember receiving any orders from any
20 of your supervisors about what work you needed to
21 prioritize that night?

22 A. I don't remember. I'm sorry.

23 Q. Do you remember which supervisors you --
24 before Ezra Smith had attempted suicide, do you
25 remember which supervisors you were interacting with

Page 57

1 the most that night?

2 A. No.

3 Q. Do the supervisors have an office that they
4 do their work out of?

5 A. There's -- yes.

6 Q. What is that called?

7 A. You have a supervisor office and Lieutenant
8 Daniel has an office.

9 Q. Are they located next to one another?

10 A. No.

11 Q. How close are they to booking?

12 A. Both are in booking.

13 Q. When you say, they're both in booking, are
14 they near the GCIC station?

15 A. Can I put it -- I can...

16 Q. You can amend it, if you'd like, yeah.

17 A. So this is super --

18 MR. BUCKLEY: She's on Exhibit 3.

19 MR. SMITH: And that's Exhibit 2. Okay.

20 MR. SMITH: (Resuming)

21 Q. So that's Exhibit 3 that you just marked.
22 And so if I'm understanding that correctly, then
23 Lieutenant Daniel is closer to the nurse's office?

24 A. Yes.

25 Q. All right. And then the supervisor's office

Page 59

1 seven?

2 A. I was working with Deputy Tracey and Deputy
3 Gomez.

4 Q. What were Deputies Tracey and Gomez doing as
5 it related to the booking of the inmate --

6 A. Deputy Gomez was assigned to booking and
7 Deputy Tracey was assigned a security role and
8 movement.

9 MR. BUCKLEY: She's referring to Exhibit

10 1.

11 MR. SMITH: (Resuming)

12 Q. I understand the assignment. I guess more on
13 a practical level, we talked about sort of the arc of
14 how people go through booking. Were any of them
15 making files for the inmates?

16 A. We were all -- I was focused on just doing,
17 like, I work a folder, I work it, and then I moved to
18 another one. So I really can't say what Deputy
19 Tracey -- how she was working, or Deputy Gomez.

20 Q. Well was there anyone besides you who were
21 working the folders?

22 A. That's what I'm adding. That's what I'm
23 saying. We all were working folders, releases.

24 Q. And between the three of you -- well let me
25 back up. When you talk about working in folder, what

Page 58

1 within the booking is -- how to describe it? Is on
2 the other side of the platform from cells eight
3 through 14, is that right?

4 A. I'm sorry. It's on the booking platform.

5 Q. It's on the platform itself?

6 A. Yes. This isn't to scale at all.

7 Q. That's fine.

8 A. I'm sorry.

9 MR. BUCKLEY: I'm just trying to find
10 where wrote -- oh -- Sup office. S-u-p. All
11 right. And you wrote it right there on there
12 and then on 3 here's Lieutenant office. Is
13 there a place where that would go on there? Or
14 you can't see it?

15 THE WITNESS: No, sir, you can't see it.

16 MR. BUCKLEY: Okay. Thank you. Sorry
17 to interrupt.

18 MR. SMITH: No, no, you're fine.

19 MR. SMITH: (Resuming)

20 Q. All right. Besides there being a lot of
21 people in holding cell seven, do you remember
22 anything else that made that -- made that night busy?

23 A. No, sir.

24 Q. How many people were working to process the
25 files of the men who were located in holding cell

Page 60

1 specifically do you mean? What do you do with the
2 folder that causes you to work it out?

3 A. Excuse me. When someone is coming -- excuse
4 me -- you're getting their folder ready so they can
5 be clear to go to general population. Getting their
6 folder ready consists of fingerprinting them, it
7 consists of making sure they have a picture, all
8 forms that they need are signed, making sure they
9 have a medical clearance to go to general population,
10 their criminal history from GCIC, it's a lot of forms
11 that go into the folder.

12 Q. If you had to estimate, how long does it take
13 to get through a folder?

14 A. It depends on the deputy. It could take an
15 hour minimum.

16 Q. When you say it depends on the deputy, I
17 mean, for you, what's your kind of -- if you're
18 looking at what you have to do today, how long would
19 you set aside for -- this is how long it's probably
20 going to take me to do this folder?

21 A. I can complete a folder in an hour.

22 Q. Okay. Had you worked with Deputy Gomez
23 before?

24 A. Yes.

25 Q. How would you describe Deputy Gomez at that

1 time, back in July of 2024?

2 A. Deputy Gomez was a good officer. He was new.

3 Q. Being new, did he have more questions?

4 A. Yeah, he asked a lot of questions. If he
5 needed to know something, he would ask.

6 Q. Were you often assigned to a similar part of
7 the jail as Deputy Gomez?

8 A. No.

9 Q. That night, did Deputy Gomez ask you anything
10 about what he was supposed to be doing?

11 A. I assisted him with fingerprinting because
12 you can put someone's information in wrong and it'll
13 be on their record. So I was helping him with that.

14 Q. Fingerprinting, does that take place next to
15 the booking computers?

16 A. No. I put it on Exhibit 3. There's a
17 section of the booking area that has a fingerprint
18 machine and a camera.

19 Q. Okay. It's the cameras for taking the
20 person's identification photo?

21 A. Yes.

22 MR. BUCKLEY: So that's what's written
23 at the bottom?

24 THE WITNESS: Yes.

25 MR. SMITH: (Resuming)

1 for purposes of identification.)

2 MR. SMITH: All right. Making sure. I
3 don't want to show it to you before I show it to
4 you, Tim.

5 MR. BUCKLEY: No, no, I understand.

6 Thank you. Did y'all send us the screenshot of
7 the earlier one we were talking about yet?

8 MR. SMITH: I have not, no.

9 MR. SMITH: (Resuming)

10 Q. Okay. So these pictures are blurry, so I
11 apologize. But in this -- right at the moment we're
12 at, roughly, what time did you come on duty that day?

13 A. 6:00 p.m.

14 Q. 6:00 p.m.? Let me fast forward to where we
15 are. Let me start here. So we're at 18:56:23 on the
16 202478 area. I think we'll call it the regular
17 booking area, cam nine. Do you see the individual in
18 the bottom right hand corner of the screen?

19 A. Yes.

20 Q. Okay. Who's that?

21 A. Deputy Gomez.

22 Q. All right. That's Deputy Gomez? So Deputy
23 Gomez was in a black polo shirt and khaki pants of
24 some sort?

25 A. Yes.

1 Q. Do you remember what part of the night you
2 were helping Deputy Gomez with his fingerprinting?

3 A. No.

4 Q. Did you see what it was that -- well, let me
5 back up. My understanding is that Deputy Tracey was
6 assigned to the rover position; is that correct?

7 A. Yes.

8 Q. Based on Exhibit 1? So as a rover, what
9 were -- what would her responsibilities be in the
10 booking area?

11 A. She's just assisting with booking.

12 Q. And so in terms of assisting with booking, do
13 you and Deputy Gomez ask her to do certain things for
14 you?

15 A. No, sir. She's assisting booking. She will
16 help put people in the system and help release people
17 from the system.

18 Q. Prior to the -- let me see if we can find
19 where folks were. That might be helpful. I don't
20 know what everyone looks like, to be honest, so it's
21 helpful for me to have you point out who is who. So
22 I'm going to show you the view that we have that is
23 labeled booking area, 782024 area -- well, no area
24 specified. Booking area.

25 (Whereupon, Exhibit Number 5 was marked

1 MR. BUCKLEY: Is that going to be an
2 exhibit?

3 MR. SMITH: We'll make cam nine an
4 exhibit, yes. We'll call this -- I think we're
5 on 4. No, we're on 5.

6 MR. SMITH: (Resuming)

7 Q. Okay. I'm showing you 19:03:17 of cam nine.
8 Do you recognize who that person is?

9 A. I do not. Not from the still, no, sir.

10 Q. Okay. The shots are blurry, so I apologize.
11 We're at 19:04. There's a woman walking up with a
12 piece of paper to the -- to the -- to this area here.
13 Do you know who that is by chance?

14 A. I'm not sure exactly who it is. I believe
15 it's a nurse because she's in plain clothes.

16 Q. Okay. Do you remember who -- what nurse was
17 working that day?

18 A. I do not remember all the nurses working that
19 night.

20 MR. BUCKLEY: Is that 6?

21 MR. SMITH: No. This is -- this is
22 going to be -- we're just going to put the
23 video, so you guys have the video.

24 MR. BUCKLEY: So 5 is the whole video?

25 MR. SMITH: Yeah. That's why I'm

Page 65

1 calling out the numbers on there to make it a
2 little faster.

3 MR. BUCKLEY: Timestamp, I get it.
4 MR. SMITH: (Resuming)

5 Q. Am I correct that inmate workers wear
6 highlighter yellow jumpsuits?

7 A. Yes.

8 Q. Okay. So this is 20:07:24, up the top right
9 hand corner, can you see who it is? I know, it's
10 really tough. In fact, I can try and make it a
11 little bit bigger, if you'd like.

12 A. No.

13 Q. Give me one second. And that may be the
14 problem. If you're not able to identify people from
15 that area, then that will just be it. I'm just going
16 to assume that this is going to be too pixelated for
17 you. We're at 20:06 just running it back just a
18 little bit -- enlarged a little bit to help.

19 A. It's very -- I can't tell who it is.

20 Q. Okay. 20:24:26, do you recognize the officer
21 there?

22 A. It looks like a couple officers. Yeah,
23 that's Deputy Rowe.

24 Q. Deputy Rowe? Okay. We're at 20:55:04, can
25 you tell me who the two individuals are by that cell

Page 67

1 where you were around 8:00 p.m. on your shift?

2 A. I do not.

3 Q. Okay. But the booking area itself is an open
4 space, is that right?

5 A. Yes, sir.

6 Q. When someone is talking on the phone using
7 the speaker phone, can you hear it from other parts
8 of the platform?

9 A. Not necessarily. It depends on how loud it
10 is in booking. It's a lot going on.

11 Q. Do you remember talking to Deputy Tracey
12 about Mr. Smith's mother calling?

13 A. No, sir.

14 Q. Did Deputy Tracey talk to you at any other
15 point in time that evening about Mr. Smith's file?

16 A. His file?

17 Q. Yes, ma'am.

18 A. What file?

19 Q. The booking file, the physical file that's
20 made once you brought someone into the holding cell
21 and come back and you make a file with all their
22 documents.

23 A. No, sir.

24 Q. Do you remember where -- do you remember
25 where Mr. Smith -- whether Mr. Smith was going to be

Page 66

1 that's open?

2 A. Can you press that?

3 Q. I can go back if I need --

4 A. That is me and that is Nurse Sanchez.

5 Q. Okay. So we see you there at 20:55:05, are
6 you all doing pill call? Is that what's happening?

7 A. Yes.

8 Q. All right. And for -- I understand -- is
9 that cell one?

10 A. Yes.

11 Q. Okay. So 21:03:17, who's that gentleman?

12 A. That's sergeant Hall.

13 Q. All right. I'm sorry. Just to make sure, I
14 think we have a slightly better picture of you here;
15 correct? This is 21:23:22, is that you?

16 A. Yes, sir.

17 Q. Okay, great. Now, do you know if you took a
18 break that evening?

19 A. I do not.

20 Q. And do you remember when Deputy Tracey came
21 into the booking area to assist?

22 A. No, sir.

23 Q. It's our understanding that sometime around
24 8:00 p.m. Deputy Tracey received a phone call from
25 Mr. Smith's mother. First of all, do you remember

Page 68

1 going to general population or transferred to another
2 facility?

3 A. I don't know.

4 Q. What kind of basic information do you get on
5 that card once you put someone to the cell?

6 A. Name, date of birth, height, weight, address,
7 phone numbers, the reason they're at the facility,
8 the time that they arrived, the date and time that
9 they arrived, the officer that arrested them, the
10 officer that searches them, emergency contact
11 information is also on there.

12 Q. At what point would you get prior booking
13 histories?

14 A. His criminal history?

15 Q. Well, other bookings at the jail,
16 specifically.

17 A. When you input him into the system.

18 Q. So at the time that you're taking the
19 material from the folder and putting that information
20 into the -- into the computer system?

21 A. Yes.

22 Q. We're at 22:03:51 on the same video. In the
23 bottom right hand corner of the screen, who is that?

24 A. That's Deputy Tracey.

25 Q. Okay. Had you -- prior to that night, had

Page 69

1 you been at the Rockdale County -- well, excuse me.
2 Had you seen Ezra Smith at the Rockdale County
3 Sheriff's jail prior to that night?

4 A. Yes.

5 Q. Okay. When did you see him?

6 A. I'm not sure. We did first appearance court,
7 and he appeared in court.

8 Q. Okay. When you say, you did first appearance
9 court, where does that happen?

10 A. It's a separate part of the jail. It's a
11 courtroom.

12 Q. And so people who are doing first appearance
13 in that courtroom are doing it virtually?

14 A. No, the judge is there.

15 Q. Okay. So the judge comes to the jail and
16 then conducts the hearing there?

17 A. Yes.

18 Q. Do you remember -- well, first of all, do you
19 remember when -- how long before this night you had
20 met him in first appearance court?

21 A. No, sir.

22 Q. Was it the same year?

23 A. I do not know.

24 Q. Okay. What was your role during that first
25 appearance court?

Page 71

1 THE WITNESS: Can you specify what
2 you're asking me?

3 MR. SMITH: (Resuming)

4 Q. Well, I was just trying to remember -- I was
5 trying to ask you to tell me about what you remember
6 that led up to the suicide attempt. But let me jump
7 back just a second. At one point during the night,
8 you mentioned that every cell in the booking unit has
9 an intercom, right?

10 A. Yes.

11 Q. Okay. So at one point in the night, am I
12 correct that you heard another inmate hit the
13 intercom button and say this white guy is, and I'm
14 paraphrasing, this white guy is saying he's thinking
15 about committed suicide?

16 A. Yes.

17 Q. Okay. At that point in time when you heard
18 that statement, where were you located in the booking
19 area?

20 A. Not sure exactly where I was on the platform.

21 Q. You said that the -- if I remember correctly,
22 and correct me if I'm wrong, like, the intercom goes
23 to the area where the booking computers are?

24 A. Yes.

25 Q. All right. And on the -- on your side of

Page 70

1 A. I just stood in a courtroom.

2 Q. Were you the movement officer that day?

3 A. I do not remember.

4 Q. And what do you remember about Ezra Smith
5 from that day?

6 A. Nothing. He was in court. It was first
7 appearance court. Everyone talked to the judge, they
8 signed paperwork for their bond, and we moved them
9 out of the courtroom.

10 Q. Well, I guess what stood out about Mr. Smith
11 such that you would remember he was one of the people
12 there that day?

13 A. I remember him from the incident.

14 Q. And so seeing him at the incident recalled
15 the earlier meeting with him?

16 A. Yes, sir.

17 Q. I'm going to move forward to later in that
18 shift. What do you remember about the events that
19 led up to Mr. Smith's suicide attempt?

20 MR. BUCKLEY: I'm going to object to the
21 form of the question, but you may answer.

22 THE WITNESS: I'm sorry?

23 MR. BUCKLEY: I think it's a very broad
24 question, so I stated a legal objection. But
25 I'm not instructing you not to answer.

Page 72

1 booking, that is -- as an officer, does the intercom
2 just play out of a speaker? Or do you have to pick
3 up a phone? How do you interact with it?

4 A. You have to press a button so someone can
5 talk through the intercom.

6 Q. Okay. So how do you know to press the
7 button?

8 A. It makes an alarm sound.

9 Q. What's that alarm sound like?

10 A. Like a loud -- like -- an alarm -- like -- it
11 just keeps, like, beeping very loud.

12 Q. All right. Enough to annoy you to hit the
13 button?

14 A. Yes.

15 Q. And can you -- once you hit the button, then
16 the other -- the person on the other side is able to
17 talk?

18 A. Yes.

19 Q. To the best of your recollection, what did
20 you hear them say when they hit the intercom button?

21 A. This white boy is going to kill himself.

22 Q. All right. Were you somewhere where you
23 could see the people in the cell?

24 A. No.

25 Q. What did you do after you heard that?

Page 73

1 A. We spoke to them in the cell to see who they
2 were talking about. Once we got to the cell,
3 everybody was laughing. Even the white boy in the
4 cell, which was Ezra Smith, he was laughing. And so
5 we asked them, is everybody all right? Did anybody
6 need suicide? They all just want to know when they
7 getting out the cell.

8 Q. So let's rewind back. When you say, we, who
9 are you talking about?

10 A. Deputy Gomez, I know -- Deputy Tracey.

11 Q. So the three of you physically went to the
12 cell?

13 A. I'm not 100% sure who was at the cell.

14 Q. Were you at the cell?

15 A. Yes.

16 Q. All right. And then, well, back up. Are
17 you -- well, you said you weren't sure who else was
18 at the cell with you; am I correct in that?

19 A. No.

20 Q. Did you talk to anybody about what you had
21 seen after you went to the cell?

22 A. No, sir.

23 MR. BUCKLEY: Ever? Or that night?

24 MR. SMITH: Yeha. Well, she said, no,
25 but I'll be happy to clarify.

Page 75

1 A. Before the incident?

2 Q. Correct, before the incident. Between the
3 incident and the intercom being pushed.

4 A. No.

5 Q. And after you went to the cell, am I correct
6 then that you didn't tell anybody about what you saw
7 at the cell between the intercom and the incident
8 occurring?

9 A. I'm not sure. I know on the platform -- was
10 talking about the gentleman in the cell that they
11 playing.

12 Q. So who all was talking about that?

13 A. Me, Gomez and Tracey.

14 Q. Was anyone else on the platform at the time?

15 A. I do not remember.

16 Q. All right. At some point later, am I correct
17 that Ezra was the last person, or the only person, in
18 that cell?

19 A. Yes.

20 Q. Do you know at that point how long he had
21 been there?

22 A. I do not.

23 Q. That's information, though, that they have in
24 the in the folder, right? Like, when he was brought
25 in?

Page 74

1 MR. SMITH: (Resuming)

2 Q. So during that shift, did you talk to anyone
3 else about what you had seen at the cell?

4 A. After the incident?

5 Q. No, we're sticking with the intercom. You --
6 someone mashed an intercom, said this white boy is
7 fixing to kill himself, or whatever it was they were
8 saying, somewhere there along that line, and then you
9 go to the cell, right? All right. After you go to
10 the cell, and -- how long were you at the cell? Let
11 me ask that first.

12 A. I'm not sure because I wasn't just speaking
13 to one person. I was speaking to the whole group
14 because people were saying they've been there for
15 hours and they needed to be get out of booking.

16 Q. So after you've talked to the people in the
17 cell, that night, did you go and tell anybody else
18 what you saw or heard?

19 A. I'm not understanding what you mean, talk.
20 Tell anybody what?

21 Q. You heard someone say that this white guy is
22 is going to kill himself?

23 A. Yes.

24 Q. Did you tell anybody that night that you
25 heard that?

Page 76

1 A. Yes. It should be on the card.

2 Q. How long is someone supposed to be in booking
3 before they're processed?

4 A. I'm not sure.

5 Q. Was there any time -- to the best of your
6 knowledge, was there any time restriction placed on
7 how long people were to be in booking?

8 A. No, sir.

9 Q. After the -- after Mr. Smith was the last
10 person in the cell, what, if anything, did you
11 observe about Mr. Smith's behavior in the cell?

12 A. He was upset, banging at the door.

13 Q. Can you describe how he was banging?

14 A. So, as you can see on the computer, it's a
15 glass, like, a clear -- just bang on the door.

16 Q. Okay. How long was he doing that?

17 A. I'm not sure.

18 Q. Do you remember where you were located when
19 that was happening?

20 A. No, sir.

21 Q. Could you hear him banging then?

22 A. Yes, I could hear him banging.

23 Q. All right. Did you go over and see what was
24 going on?

25 A. No, sir.

Page 77

1 Q. Did anyone go over to see what was going on?
 2 A. I'm not sure.
 3 Q. At some point, did Deputy Tracey go over?
 4 A. Deputy Tracey and him were -- yes.
 5 Q. Okay. Deputy Tracey and him were doing what?
 6 A. She did go to the door and talk to him at the
 7 door.
 8 Q. Okay. What was that conversation about?
 9 A. I do not know. They were just yelling at
 10 each other.
 11 Q. So you could hear them yelling at each other?
 12 A. But I don't really know what they were
 13 saying. Like, I don't -- in working in corrections,
 14 you kind of tune out noise. So they were just loud.
 15 Q. And you're saying you don't remember anything
 16 specifically that was said between the two of them
 17 when she went over there?
 18 A. During the time, she was yelling, do it. I
 19 remember her saying, do it.
 20 Q. Do you remember him saying that he was
 21 suicidal?
 22 A. Yes, he did yell at her and said he was
 23 suicidal.
 24 Q. So just to be clear, was her -- was her
 25 saying, do it, was that a response to what he was

Page 79

1 again?
 2 A. Yes.
 3 Q. And my understanding is that Deputy Tracey,
 4 she was there -- she'd been working at Rockdale
 5 longer than you, is that right?
 6 A. Yes, sir.
 7 Q. Okay. How did you two get along on shift?
 8 A. Coworkers. We weren't enemies.
 9 Q. Well, I'm just asking though, like, how
 10 did -- some people work well together and some people
 11 don't. Did you all work well together?
 12 A. Oh, yes, sir.
 13 Q. Okay. Did you find her helpful when you
 14 needed answers to questions you didn't know?
 15 A. Yes.
 16 Q. Did she train you at all when you were coming
 17 up through it?
 18 A. I don't think so.
 19 Q. Do you know anyone who had difficulties with
 20 Deputy Tracey?
 21 A. No.
 22 Q. So after the yelling exchange that you
 23 described, what happened next?
 24 A. Deputy Tracey came back on the platform and
 25 she was by the cameras looking at that cell, and I

Page 78

1 telling her?
 2 WAYMIRE: Object to form. You can
 3 answer.
 4 MR. BUCKLEY: Joined, you can answer.
 5 THE WITNESS: That, I'm not sure. Like,
 6 they were yelling back and forth, just arguing.
 7 MR. SMITH: (Resuming)
 8 Q. So if I'm understanding you correctly, you
 9 don't remember which was said first, I'm suicidal, or
 10 do it?
 11 A. Yes, I'm not sure.
 12 Q. Could you see Mr. Smith from where you were
 13 when he said that?
 14 A. No, sir.
 15 Q. Could you see Deputy Tracey?
 16 A. She was at the door.
 17 Q. Could you see her though?
 18 A. I just see her back.
 19 Q. How long were you and Deputy Tracey on shift
 20 together?
 21 A. I'm not sure.
 22 Q. Did you see her outside of work at all?
 23 A. No.
 24 Q. When you're assigned to a shift, do you
 25 normally work with the same folks over and over

Page 80

1 went over to her, and she was, like, she couldn't see
 2 him, so she went back down to check the cell, and
 3 that's when she said she needed help. So I got the
 4 key and went down there and that's when we found him
 5 kneeling by the telephone.
 6 Q. And I'm sorry to ask some of these questions,
 7 I know that, that would be a hard thing to find. Do
 8 you remember who it was that unwrapped the cord from
 9 Mr. Smith?
 10 A. I did.
 11 Q. And then who -- who began CPR?
 12 A. I believe Nurse Sanchez did CPR first.
 13 Q. All right. So I know that the drawings we
 14 had earlier aren't to scale, but how far away is the
 15 nurse's office from cell seven, roughly speaking?
 16 A. It's not that far. I don't know how to
 17 estimate it.
 18 Q. If you're walking between the two, would it
 19 take you less than a minute to get to one?
 20 A. Yes.
 21 Q. So when the intercom button got pushed and
 22 someone told you, this white guy is going to kill
 23 himself, why didn't you report that information at
 24 that time?
 25 A. It didn't -- they were all in there joking

Page 81

1 and playing. It seemed as if they were just saying
2 stuff to get our attention, to get them to get us to
3 move faster.

4 Q. Did you go back and look at Mr. Smith's file
5 to see whether or not he had a history of suicide
6 attempts or mental health illness?

7 A. No, sir.

8 Q. Sorry, there's a storm rolling in behind you.
9 Under Rockdale Sheriff -- Rockdale County Sheriff's
10 Office guidelines for suicide prevention, were you
11 required to report that information once you heard
12 it?

13 A. It's up to my discretion, yes, sir.

14 Q. You said it's up to your discretion?

15 A. Yes, sir. May I clarify my answer?

16 Q. Please.

17 A. So if inmates -- they yell, suicidal, when
18 they're unhappy often. So if you feel as if it's an
19 inmate that needs to be gone on suicide watch, then I
20 will put them on suicide watch. In that incident, I
21 didn't feel the need to put anyone on suicide watch
22 because they were unhappy about being in the booking
23 cell for so long. And they were all in there
24 laughing and joking.

25 Q. Now, when you say, it's up to your

Page 83

1 A. Yes.

2 Q. And then, when you heard Mr. Smith scream
3 that he was suicidal at Deputy Tracey, what action,
4 if any, did you take following hearing that
5 statement?

6 A. None.

7 Q. And what was your reason for not taking any
8 action at that time?

9 A. Because I figured he was just upset as he was
10 early in the night.

11 Q. In between those two times, had you looked at
12 his file?

13 A. No, sir.

14 Q. And between those two times, had he been
15 screened by the nurse?

16 A. I'm not sure. I don't think so.

17 Q. And if I'm understanding you correctly, just
18 tell me if I'm wrong, you felt that you had the
19 discretion not to take any action during that
20 second -- when you heard him yell that he was
21 suicidal?

22 A. No, sir. I didn't feel the need to
23 interject. He was upset. He was yelling with Ms.
24 Tracey.

25 Q. At that point, Mr. Smith was in the cell by

Page 82

1 discretion, where did you -- was that how you were
2 trained? That you had the discretion to determine
3 whether or not they were being serious about the
4 claim of suicide?

5 A. Say that one more time.

6 Q. Sure. Was that part of your training that
7 you had the discretion to determine whether or not
8 the person was serious about a statement of --

9 A. No, sir.

10 Q. -- committing suicide? That wasn't part of
11 your training?

12 A. No, sir.

13 Q. How were you trained differently? Or the
14 same?

15 A. Over years of experience I've had, like, it's
16 just -- from the experience I've had up to then, if
17 they were in the cell, they were saying they were
18 suicidal, and you ask them, hey, are you suicidal?
19 And you talk to them, if they say, yes, they are
20 suicidal, I'll put them on suicide watch. Referring
21 to the incident with Mr. Smith when we were asking
22 him, was he suicidal, he was laughing and joking,
23 saying, no.

24 Q. Okay. So you're saying that Mr. Smith
25 specifically told you that he wasn't suicidal?

Page 84

1 himself; correct?

2 A. Yes, sir.

3 Q. All right. And if we've already established
4 that in that cell was a phone box with a phone cord,
5 right?

6 A. Yes, sir.

7 Q. If you were to have followed suicide -- well,
8 back up. If you had taken action along the lines of
9 following the suicide protocol, having heard him say
10 that, what would have happened next?

11 A. If he was placed on suicide watch, he would
12 have been moved into a different cell, and he would
13 have lost his jumpsuit. He would have been in a
14 suicide gown and given a suicide blanket. And then
15 we would check him every -- it's up to every 15
16 minutes. Was it 15 minutes?

17 Q. Suffice to say, more frequently than --

18 A. Yes, sir. I'm not sure exactly how many
19 minutes it is.

20 Q. And the cell in which you would place someone
21 wouldn't have had a phone; correct?

22 A. Not necessarily.

23 Q. Let me make sure I clarify that answer. Is
24 there a situation in which you would have put someone
25 on a suicide watch into a cell with a phone and a

Page 85

1 phone cord?

2 A. It depends on the booking space, the housing.
3 If he isn't -- it's up to the discretion of the
4 supervisor at that time where we place them.

5 Q. Okay. How does the supervisor get involved?

6 A. When we are putting him on suicide watch, we
7 will let them know, hey, we've put one on, and
8 they'll say, hey, put them cell, whatever, five.

9 Q. Are they seen by medical before you move them
10 to a different cell?

11 A. How does medical fit into what would happen
12 if you were to initiate a suicide protocol with
13 someone who says they're suicidal?

14 A. We will bring them to booking wherever they
15 at. If they're already in booking, we'll put them in
16 another cell. We will let medical know, and she will
17 come over and speak to them.

18 Q. Okay. So you move them physically to a
19 different cell first, and remove items that were
20 potentially hazards to them?

21 A. Yes.

22 Q. And then have medical come and see them?

23 A. Yes.

24 Q. And the supervising officer would tell you
25 where to --

Page 87

1 you come up to a cell, someone tells you they're
2 suicidal, you decide that they need to go on suicide
3 watch. Would you leave them alone until you got a
4 supervisor or someone else?

5 A. In the booking area, yes, I'll walk off, get
6 the supervisor, or it -- also -- you have to go by
7 this fingerprint area. That's where the gowns are
8 housed, like, kept. So you have to leave the cell
9 they're at. But in the housing pod, if you're doing
10 a round and someone says they want to go on suicide
11 watch, we'll call them on the radio while we're
12 standing there.

13 Q. After the incident -- let's actually go --
14 after the shift in which the incident occurred, did
15 you and deputy -- or Officer Tracey talk to one
16 another?

17 A. No.

18 Q. I mean, before you came on -- you were on
19 shift the next day, right?

20 A. Yes.

21 Q. Okay.

22 A. Was I? I'm not sure. I believe so.

23 Q. But then that morning, you get off at what
24 time from that shift?

25 A. 6:00 in the morning.

Page 86

1 A. Yes.

2 Q. Do you remember, was the suicide -- were the
3 suicide cells open that evening?

4 A. I believe so, yes, sir.

5 Q. All right. If you needed to get ahold of
6 your supervisor, how would you do that?

7 A. Just go to them.

8 Q. Well, so you would physically go to the
9 supervisor?

10 A. It depends on what supervisor I need. If
11 there is no supervisor in booking, I would call them
12 on the radio. If I know -- if I needed Lieutenant
13 Daniel, I would just go to his office because his
14 office is right there. If he wasn't in his office,
15 then we'll call him on the radio.

16 Q. When you're initiating suicide protocol,
17 would you -- how would you contact the supervisor?

18 A. Do the radio.

19 Q. All right.

20 A. If they're not in booking.

21 Q. All right. Once you decide to initiate
22 suicide protocol, do you leave the inmate who you're
23 about to place in the suicide protocol?

24 A. I'm not understanding the question.

25 Q. Well, I'm just trying to understand that if

Page 88

1 Q. So that next morning, after you leave the
2 shift at 6:00 a.m. through the end of that day, did
3 you and Deputy Tracey talk about what happened?

4 A. No.

5 Q. When you came back on shift together, did you
6 talk about what happened?

7 A. Yes, I asked her was she okay.

8 Q. What did she say?

9 A. She said she was talking to someone. We were
10 all talking about, like, somebody getting -- talking
11 to a counselor or something if you need help.

12 Q. All right. Did you talk at all about the
13 events before the incident happened?

14 A. I'm not sure.

15 Q. At some point -- I'm sorry. I didn't mean to
16 cut you off.

17 A. I'm not sure your question.

18 Q. Sure. So you said that you all were talking,
19 and you asked her how she was doing; correct?

20 A. Yes.

21 Q. Okay. And then you were talking generally
22 about seeing a counselor or something to deal with --
23 I'm going to put it in my own words, but to deal with
24 the trauma of seeing someone having attempted
25 suicide, right?

Page 89

1 A. Yeah.

2 Q. My question is, did you talk about the events
3 before he attempted suicide, and how they may have
4 affected whether or not he decided to commit -- or
5 attempt suicide?

6 A. No, sir.

7 Q. All right. Did Tracey tell you anything else
8 other than the fact that she was talking with
9 someone?

10 A. No, sir.

11 Q. At some point, you wrote a statement for an
12 incident report, is that right?

13 A. Yes, sir.

14 Q. When did you write that incident report?

15 A. Not long after the incident.

16 Q. On the same shift in which you were -- well,
17 during the same shift as the incident?

18 A. Yes.

19 Q. And who directed you to write the incident
20 report?

21 A. An investigator came over.

22 Q. Do you remember who that was?

23 A. I do not.

24 Q. All right. In writing the incident report,
25 did you talk to anybody about what you saw or heard

Page 91

1 follow up about the incident?

2 A. We had that one conversation. I left to go
3 to mandate a couple weeks right after that.

4 Q. Were you ever interviewed by anyone at the
5 Rockdale County Sheriff's Office about the incident?

6 A. Interviewed?

7 Q. Yes, ma'am.

8 A. I spoke with Sergeant Tatum. That was all.

9 Q. You also spoke at Deputy Tracey's appeal of
10 her termination; correct?

11 A. Oh, yes, sir.

12 Q. So you talked with an investigator, you
13 think, sometime in the area of two hours after the
14 incident, right?

15 A. Yes, sir.

16 Q. You wrote a report at that time?

17 A. Yes, sir.

18 Q. Sometime later you talked with Sergeant
19 Tatum?

20 A. Yes, sir.

21 Q. Was that conversation in person or over the
22 telephone?

23 A. It was in person.

24 Q. Were you ever -- did you ever follow up by
25 email with Sergeant Tatum?

Page 90

1 that evening?

2 A. No, I was talking to the investigator, and he
3 was, like, put everything on paper. Because I want
4 to say it wasn't even two hours after the incident.

5 Q. All right. And later the investigator
6 followed up with you, is that right?

7 A. No.

8 Q. Did someone else follow up with you from the
9 sheriff's office about the incident?

10 A. Yes.

11 Q. Do you remember who that was?

12 A. Sergeant Tatum.

13 Q. And why did Sergeant Tatum follow up with
14 you?

15 A. He was saying, if I needed help, like,
16 counseling. Then he asked, during the incident,
17 during the conversation, if, like, did I hear
18 anything out the way. But his main focus was, like,
19 do I need help? Have I done CPR on someone before?

20 Q. Well, when he asked you, if you -- if there
21 was anything out of the way, as you put it, what was
22 your response to that question?

23 A. I don't remember at that time. We were
24 focused on me going to counseling.

25 Q. How many times did you and Sergeant Tatum

Page 92

1 A. Yes.

2 Q. So you had a conversation in person, was that
3 before or after you followed up by email?

4 A. Before.

5 Q. Then there was a follow up by email? And
6 then at some point you testified at the -- at the
7 Merit Board appeal for Deputy Tracey?

8 A. Yes, sir.

9 Q. In between the email with Sergeant Tatum and
10 Merit Board hearing, did you talk to anyone else from
11 Rockdale County Sheriff's Office about the incident?

12 A. No, sir.

13 Q. Did you ever talk -- after the incident, did
14 you ever talk with Officer Gomez about what happened?

15 A. No, sir.

16 Q. So you talked to Deputy Tracey, but you
17 didn't talk to Officer Gomez?

18 A. I'm confused. You asked me, did we go over
19 the incident? Once we all came back to work after
20 the incident, I made sure Gomez was okay, asking him,
21 like, did he need counseling? Refer him to people
22 and -- but that was all. Like -- and I didn't just
23 ask him. I asked anybody who was around, like,
24 because it was traumatic.

25 Q. Well, that's why I'm just -- I'm just trying

Page 93

1 to figure out who all you might have talked to about
2 what happened.

3 A. No, I mean -- okay. I'm sorry.

4 Q. You're fine.

5 A. So, yes, most people in my shift, I ask them,
6 like, if they responded or anything, like, hey, do
7 you need to talk to anybody? Even Lieutenant Daniel,
8 everybody had a conversation.

9 Q. Okay. So Lieutenant Daniel and Sergeant Hall
10 both responded, right?

11 A. Yes.

12 Q. And Nurse Sanchez responded?

13 A. Yes.

14 Q. Was there anyone else who responded? So --
15 well, let me back up. So we have you, we have Gomez,
16 we have Tracey; correct?

17 A. Yes.

18 Q. Sanchez?

19 A. Yes.

20 Q. Daniel Hall?

21 A. Yes.

22 Q. Did anyone else respond from your shift?

23 A. Yes. We called for additional deputies. I
24 know Deputy Dieudonne was there, Deputy Sheriff
25 Little, other nurses. It was, like, chaotic.

Page 94

1 Q. In terms of the follow up you were just
2 talking about, when you were saying that you were
3 asking if everyone was doing okay, if they had
4 counseling, was it primarily the people on -- who
5 were in booking on your shift that you were talking
6 to?

7 A. No.

8 Q. So, for example, you said Deputy Sheriff
9 little was there? Did you talk to Deputy Sheriff
10 Little about it?

11 A. Yes.

12 Q. All right. Was the substance of the
13 conversation you had with Deputy Sheriff Little,
14 mostly about whether or not Deputy Sheriff Little was
15 taken care of? Is it himself? I don't actually know
16 Deputy Sheriff Little.

17 A. Yes, himself.

18 Q. Okay. And whether or not he was taking care
19 of himself?

20 A. Yes.

21 Q. Okay. Did you talk about the events of that
22 evening, apart from whether or not people were
23 getting counseling, you know, as a result of the
24 events of that evening? Did you talk to people about
25 the events that they saw or heard that evening?

Page 95

1 A. No, sir.

2 Q. Okay. And prior to -- no one from the
3 sheriff's office then reached out to you to -- prior
4 to the Merit Board hearing, but after you talked with
5 Tatum, no one reached out to you about what your
6 testimony would be at the Merit Board hearing?

7 A. No, sir.

8 Q. And as I understand it coming here today,
9 besides talking with your attorney, which I don't
10 need to know about, did you talk with anyone at the
11 sheriff's office about the substance of what happened
12 that night?

13 A. I'm sorry. Have I went over the incident
14 since? Is that what you're asking me?

15 Q. Correct. In preparation for today.

16 A. No, sir.

17 Q. Do you still keep in touch with Monique
18 Tracey?

19 A. No, sir.

20 Q. Do you still have contact with Deputy Gomez?

21 A. In passing.

22 Q. When you say, in passing, how so?

23 A. So I'm now assigned to uniform patrol. So if
24 I bring someone into the jail, and he's there, I will
25 see him. Other than that, no.

Page 96

1 Q. Okay.

2 MR. BUCKLEY: I represent both of them,
3 so I've seen them together. But, of course,
4 that's privileged.

5 MR. SMITH: Sorry, I should have better
6 demarcated that.

7 MR. BUCKLEY: I just want to make it
8 clear.

9 MR. SMITH: (Resuming)

10 Q. Okay. It's quite the show back there.
11 During the Merit Board hearing that Deputy Tracey, or
12 excuse me, that Officer Tracey had, it was my
13 understanding that she had -- she told the Merit
14 Board that you were refusing to process Ezra Smith's
15 file that night; is that correct?

16 A. I don't think --

17 Q. Specifically she said that -- something along
18 the lines that you didn't want to deal with,
19 quote/unquote, his white privilege. Does that ring a
20 bell?

21 A. No, sir.

22 Q. Okay. So you didn't tell that to Deputy
23 Tracey?

24 A. No, sir.

25 Q. And you didn't tell Gomez to leave Ezra Smith

Page 97

1 unprocessed until the next shift?

2 A. No, sir.

3 Q. And did you tell Ms. Tracey that you didn't
4 want to deal with Ezra because he'll cry 52?

5 A. No, sir.

6 Q. And 52 in the parlance of jail codes, means
7 what?

8 A. Suicide.

9 Q. All right.

10 MR. SMITH: Let's go ahead -- I'm
11 nearing the end of questions I have, so let's go
12 ahead and take another small break so I can go
13 back through my notes.

14 (Whereupon, a break was taken.)

15 MR. SMITH: It's 15:56, 3:56. We're
16 going back on the record.

17 MR. SMITH: (Resuming)

18 Q. Before we close out, I do want to ask you, we
19 talked about what would happen if you decided to
20 institute suicide protocols at the jail when you were
21 working there. Could a nurse institute suicide
22 protocols?

23 A. Yes.

24 Q. Okay. In your experience, how did that look
25 different, if at all?

Page 99

1 or anything? If they have, she'll divert them to the
2 hospital. They'll bring back paperwork saying that
3 they were cleared from the hospital. But if they've
4 come, say, today, and then they weren't allowed in a
5 jail, and then they came back two weeks later, those
6 are two different -- separate times. It's not
7 necessarily, like, oh, he won't come back because he
8 wasn't allowed back last time.

9 Q. Okay. So, yeah, I guess specifically what
10 I'm kind of interested in is, if Mr. Smith had been
11 in psychiatric care immediately prior to being
12 brought into the prison, is that something that would
13 have come along with him in terms of things you have
14 known about when he's brought into the facility?

15 A. No, sir.

16 Q. Okay. And I think we talked about this, but
17 just to make sure that I'm clear on this, for anyone
18 who comes into the jail who had prior incidents in
19 the jail, when would you learn about those prior
20 incidents?

21 A. When they're booked in.

22 Q. Okay. So during the booking process?

23 COURT REPORTER: I just need an audible
24 answer.

25 THE WITNESS: Yes. Sorry, yes.

Page 98

1 A. So with the booking process -- or they --
2 sometimes they came up to us in the housing pod and
3 they be, like, hey, this person is going suicide
4 watch. Or during booking, they'll come let us know,
5 like, hey, this person is going suicide watch.

6 Q. Okay. And so for a nurse then, they would
7 tell one of the officers?

8 A. Yes.

9 Q. That's what happens?

10 A. Yes.

11 Q. All right. And then it would be up to the
12 officer then to complete the protocol?

13 A. Yes.

14 Q. And one thing that I don't think we've talked
15 about, and I wanted to make sure that I understood.
16 In the information you get, you know, as someone is
17 being brought into the jail, if they were previously
18 diverted from jail to go to the hospital, say, would
19 that be information you would get on their return?

20 A. Only if they went to the hospital prior to
21 coming into the jail at that moment.

22 Q. Well, explain more, and maybe that will --
23 make sure we're on the same page.

24 A. So if someone's coming in the sallyport, and
25 the nurse asks questions, hey -- been in an accident

Page 100

1 MR. SMITH: That's good. I do it all
2 the time. That's how we normally talk. All
3 right. That is all the questions I have for you
4 right now. I may have some on redirect at some
5 point here, but I know the other attorneys have
6 a couple questions for you, as well. Thank you
7 again for your time this afternoon.

8 MR. VEAL: I don't have any questions.

9 WAYMIRE: This attorney doesn't have any
10 questions.

11 MR. BUCKLEY: No questions.

12 MR. SMITH: Look at that. You're out
13 clean free. So that concludes the deposition
14 today. It's four o'clock. Thank you, Ms.
15 Jackson.

16 COURT REPORTER: I just want to make
17 sure I get the orders on the record. Did you
18 want this typed?

19 MR. SMITH: Yes, we'll take an
20 electronic copy.

21 COURT REPORTER: And did you want a
22 copy, as well?

23 MR. VEAL: E-tran with exhibits.

24 COURT REPORTER: Did you want a copy,
25 Mr. Buckley?

Page 101

MR. BUCKLEY: I do. And I want exhibits and there's two that aren't on here. And I would also like a hard copy with the mini with the index of terms, you know, the glossary in the back.

(Whereupon, the proceedings were concluded at 4:00 p.m.)

Page 103

CERTIFICATE

GEORGIA:
FULTON COUNTY:

I hereby certify that the foregoing deposition was stenographically recorded by me as stated in the caption, and the colloquies, questions and answers were reduce to typewriting under my direction; that the foregoing transcript is a true and correct record of the evidence given.

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I further certify that I am not a relative, employee, attorney or counsel of the parties, nor am I a relative or employee of such attorney or of any party, nor am I financially interested in the outcome of the action.

This 28th day of August, 2025.

EMILY LANDRY
Certified Court Reporter
5754-6869-9805-2864
My Commission expires March31, 20206

Page 102

JURAT

SHENEQUA JACKSON

Notary Public

Sworn and Subscribed to me

This _____ day of _____.

Page 104

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- (b) In order to comply with subsection (a) of this Code Section, each certified Court Reporter shall make inquiry regarding the nature of the contract for his or her services directed to the employer or the person or entity regarding said Court Reporter's services as an independent contractor.

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a.m 3:11 20:5 44:4 88:2 able 12:8 35:21 53:8 65:14 72:16 absolutely 34:10 36:1 accident 25:18,19 98:25 accolades 23:13 Act 1:13 action 1:4 83:3,8,19 84:8 103:20 104:20,21 actions 22:25 activities 18:18 add 39:21 48:12 added 17:2 adding 59:22 additional 24:3 27:6 93:23 address 68:6 administrative 26:15,16,17 27:1 admitted 25:21,23 26:5 advice 17:8 affidavit 25:16 41:23 afternoon 4:11 100:7 agency 55:3 104:13 104:20 agreement 1:14 ahead 12:17 22:9 34:3 40:11 97:10 97:12 ahold 86:5 al 1:6 alarm 72:8,9,10 allowed 99:4,8 amend 57:16 amount 9:17 angle 30:11 35:2 37:3 annex 50:6 ANNOTATED 104:18 annoy 72:12	answer 21:23,25,25 53:8 70:21,25 78:3,4 81:15 84:23 99:24 answers 79:14 103:8 ANTONIO 2:13 anybody 9:2 73:5 73:20 74:17,20,24 75:6 89:25 92:23 93:7 anymore 11:19 anyway 48:16 apart 28:13 94:22 apologize 5:24 14:7 24:23 36:2 63:11 64:10 appeal 91:9 92:7 appearance 69:6,8 69:12,20,25 70:7 APPEARANCES 2:1 appeared 69:7 applied 22:19 apply 23:12 April 7:24 are 59:13 area 3:12 27:5,8,18 30:8 32:12 33:6 34:15,24 35:16,23 36:4 50:20 52:10 52:16 56:1 61:17 62:10,23,23,23,24 63:16,17 64:12 65:15 66:21 67:3 71:19,23 87:5,7 91:13 arguing 78:6 arrested 68:9 arrived 68:8,9 Article 104:3 artist 36:6,7 aside 60:19 asked 14:7 61:4 73:5 88:7,19 90:16,20 92:18,23 asking 5:10 17:7 31:25 32:21 41:14 46:17 48:3 71:2	79:9 82:21 92:20 94:3 95:14 asks 98:25 aspect 23:4 assigned 17:24 19:3 25:6 49:4 59:6,7 61:6 62:6 78:24 95:23 assignment 59:12 assist 18:6 48:25 49:13 66:21 assisted 61:11 assisting 62:11,12 62:15 Associates 1:23 103:14 104:6,7,8 104:11,15 Association 10:15 assume 25:2 65:16 Atlanta 1:2,17 2:14 2:18 attached 4:2 103:15 attempt 70:19 71:6 89:5 attempted 53:17 56:24 88:24 89:3 attempts 81:6 attention 25:23 81:2 attorney 2:3,9,13 2:17 6:13,23 7:2,9 95:9 100:9 103:18 103:19 104:20 attorneys 2:8 100:5 104:21 ATW 54:20,22 55:4,7,11 ATWs 56:17 audible 23:19 99:23 August 1:18 19:19 19:19 103:21 auspices 103:14 available 16:20 Ave 2:3 aveal@huffpowe... 2:15 Avenue 1:24	awards 23:13 B b 104:10,23 back 11:3 12:25 17:1 41:7 42:12 42:22 46:20 51:8 52:3 53:4 59:25 61:1 62:5 65:17 66:3 67:21 71:7 73:8,16 78:6,18 79:24 80:2 81:4 84:8 88:5 92:19 93:15 96:10 97:13 97:16 99:2,5,7,8 101:5 background 7:16 bad 51:6,7 bag 24:17 42:14 BAILEY 2:12 bang 76:15 banging 76:12,13 76:21,22 bank 33:14 53:13 banks 32:4 based 21:18 22:5 62:8 basic 41:21 42:10 68:4 basically 22:13 basis 104:22 becoming 12:1 bed 27:24 28:1 bedding 27:25 beeping 72:11 befuddled 36:1 began 80:11 beginning 14:12,15 16:1 behalf 1:10 2:2,8 2:12,16 behavior 76:11 believe 18:14 19:7 19:9 22:10 64:14 80:12 86:4 87:22 bell 96:20 belongings 24:16 best 5:12 12:24 14:12 72:19 76:5	better 6:11 66:14 96:5 beyond 35:15 bidding 104:21 big 25:2 bigger 65:11 birth 42:10 68:6 bit 5:20 7:16 24:2 41:11 53:18 65:11 65:18,18 black 63:23 blanket 84:14 blue 46:4 blurry 63:10 64:10 Board 92:7,10 95:4 95:6 96:11,14 body 44:5 bond 70:8 bookcase 45:11,21 bookcases 44:18 booked 24:6 47:11 99:21 booking 3:12 13:24 15:5,7,12,22,24 16:16 17:5,5 18:1 18:23,25 20:17 21:5 24:5 25:8,16 26:1,3,8,14,15,17 26:20,21 27:2,2,5 27:12,17,23 28:4 28:5,12,19 29:1 29:18,20 30:8 31:5 32:3,12 33:6 33:18,19 34:17,25 35:9,23 36:4,5,22 38:18,23 39:9,16 40:2 41:12,19 42:4 43:6 48:2,3,7 48:14,20 49:2,4,5 49:15 50:20 51:8 51:24,24 52:8,9 52:15,16 53:20 54:4,7 56:1,3,10 56:16 57:11,12,13 58:1,4 59:5,6,14 61:15,17 62:10,11 62:12,15,23,24 63:17 66:21 67:3 67:10,19 68:12

71:8,18,23 72:1 74:15 76:2,7 81:22 85:2,14,15 86:11,20 87:5 94:5 98:1,4 99:22 bookings 68:15 bottom 61:23 63:18 68:23 box 29:13 35:1 84:4 boy 72:21 73:3 74:6 break 6:6,8 21:10 21:13,14,15 47:19 52:25 53:2 66:18 97:12,14 breaks 6:7 briefing 20:8,10,14 20:20 briefly 24:5 bring 85:14 95:24 99:2 brings 24:7 broad 70:23 brought 24:24 67:20 75:24 98:17 99:12,14 Buckley 1:16 2:16 2:17 5:15 13:6,10 21:22 22:9 33:24 34:7,11 37:18,23 38:10 43:11 44:22 44:24 47:19 57:18 58:9,16 59:9 61:22 63:5 64:1 64:20,24 65:3 70:20,23 73:23 78:4 96:2,7 100:11,25 101:1 Buford 2:10 Building 2:10 Bull 1:23 103:14 104:6,7,8,11,15 busy 54:10,12,13 54:14,18 56:4 58:22 button 28:23 71:13 72:4,7,13,15,20 80:21	c 2:9 4:3 104:10 call 18:17,18,23 25:9 26:18 43:16 44:2,17 48:10 53:12 63:16 64:4 66:6,24 86:11,15 87:11 called 4:7,17 7:4 23:16 34:24 37:8 48:22 54:20 57:6 93:23 calling 65:1 67:12 calls 53:8 cam 3:11,12 63:17 64:3,7 camera 28:2 32:19 32:25 33:1,22 34:20,21 35:8 43:9 44:5 61:18 cameras 28:3 41:11 50:20,21 51:1,10 52:6 61:19 79:25 caption 103:7 car 25:19 card 24:10 42:3,8,9 42:12,18,19,25 46:19,20 68:5 76:1 care 94:15,18 99:11 career 23:6,7 carry 12:8 case 4:14 52:8 104:12,12,16,19 case-by-case 104:22 causes 60:2 cell 3:10 12:9,10 19:1,1 24:17,18 24:21 27:20,21,24 28:2,19,20 38:1,5 38:25 39:2,8 41:18 42:3,8 46:7 46:20 48:9 51:24 54:16 58:21,25 65:25 66:9 67:20 68:5 71:8 72:23 73:1,2,4,7,12,13 73:14,18,21 74:3 74:9,10,10,17	75:5,7,10,18 76:10,11 79:25 80:2,15 81:23 82:17 83:25 84:4 84:12,20,25 85:8 85:10,16,19 87:1 87:8 cells 27:2,3,9,13,15 27:16,17,17,19,22 27:23 28:3,8,10 28:11,12,17 29:2 29:3,18,20,24 30:3,24 31:11 36:17 37:8,8,11 37:13,14 39:11 40:1,25 50:20 53:13 58:2 86:3 center 30:21 38:18 certain 18:15 62:13 CERTIFICATE 103:1 certification 103:11 certified 1:15 10:18 103:14,23 104:5 104:19,19,23 certify 103:6,17 chain 16:1,15,19 chance 64:13 changed 18:14 42:7 chaotic 54:9 93:25 charge 15:15 16:25 104:15 charges 16:22 55:16 check 80:2 84:15 checks 12:10,10,12 52:16 Christopher 1:16 2:16 Civil 1:4,13 claim 82:4 Clairmont 1:16 2:17 clarify 73:25 81:15 84:23 classroom 11:1 clean 100:13 clear 60:5 76:15	77:24 96:8 99:17 clearance 60:9 cleared 99:3 close 47:21 57:11 97:18 closer 57:23 closest 32:18 clothes 64:15 code 46:1 104:18 104:23 codes 97:6 colloquies 103:8 color 45:23 46:1 come 7:12 12:19 18:9 21:15 25:10 25:15 41:19 42:2 48:9 52:13,18 53:19 55:16 63:12 67:21 85:17,22 87:1 98:4 99:4,7 99:13 comes 42:6 69:15 99:18 coming 4:11 6:19 19:11 20:12,22 43:13 55:24 56:9 60:3 79:16 95:8 98:21,24 command 16:1,15 16:19 commanding 21:19 commencing 1:17 Commission 103:24 commit 89:4 committed 71:15 committing 27:13 82:10 comparable 10:24 complete 9:9 60:21 98:12 comply 104:23 computer 31:6,12 31:20,21 32:6 33:15,20 34:19 35:3,14 41:13,19 46:16,22,25 50:24 51:9,22 52:1 53:12 68:20 76:14	computers 32:3,4 32:24 33:14,18,19 35:14 36:5 39:16 39:23 53:10 61:15 71:23 concluded 101:7 concludes 100:13 conduct 12:20 20:24 21:1 48:10 52:14 conducted 12:7 conducts 8:21 18:23 20:9 69:16 confused 92:18 confusing 25:14 39:7 connect 28:23 consider 17:13 considered 17:13 consists 60:6,7 construction 39:21 consult 21:6 contact 42:11 68:10 86:17 95:20 contacted 104:7 context 27:11 contraband 12:12 23:18 24:10,13 contract 104:9,24 contract/agreem... 104:11 contractor 104:25 Contracts 104:18 control 51:12,21,23 conversation 4:20 5:21 77:8 90:17 91:2,21 92:2 93:8 94:13 conversations 4:23 copy 13:8 100:20 100:22,24 101:3 cord 29:9,10,12 80:8 84:4 85:1 corner 39:3 63:18 65:9 68:23 Corporal 15:3,20 16:18 correct 8:5 10:2 14:22 18:1 26:9
--	--	---	---	--

27:2 35:10 36:22 38:2 46:9,22 48:21 49:23 53:9 62:6 65:5 66:15 71:12,22 73:18 75:2,5,16 84:1,21 88:19 91:10 93:16 95:15 96:15 103:10 correctional 19:17 corrections 10:7 22:8 23:1,14 77:13 correctly 41:25 57:22 71:21 78:8 83:17 Council 104:4 counsel 2:1 4:18 103:18 104:12 counseling 90:16 90:24 92:21 94:4 94:23 counselor 88:11,22 count 52:9,11,12,14 52:19,22 counts 52:19 County 7:20,23 10:1 23:8 55:6 69:1,2 81:9 91:5 92:11 103:4 couple 5:1 11:18 14:8,25 32:7 65:22 91:3 100:6 course 29:8 52:19 96:3 courses 19:24 court 1:1,15,23 5:17,25 23:19 69:6,7,9,20,25 70:6,7 99:23 100:16,21,24 103:15,23 104:5,7 104:18,19,19,23 104:25 courtroom 69:11 69:13 70:1,9 cover 104:14 covers 29:12 coworkers 17:10	79:8 CPR 80:11,12 90:19 created 46:24 criminal 60:10 68:14 cross- 1:11 CROSS-EXAMI... 4:9 cry 97:4 current 12:18 Currently 7:19 customary 104:15 cut 88:16 <hr/> D <hr/> D 4:3 daily 18:18 damn 36:8 Daniel 13:1 15:2,21 57:8,23 86:13 93:7,9,20 dashes 3:22 date 11:11 14:11 42:10 68:6,8 dates 13:25 14:10 day 12:19 18:17 49:7 63:12 64:17 70:2,5,12 87:19 88:2 102:18 103:21 de 1:24 2:3 deal 88:22,23 96:18 97:4 Decatur 1:24 2:4 decide 19:13 86:21 87:2 decided 89:4 97:19 Defendant 1:7 2:8 defer 16:24 demarcated 96:6 denied 103:12 Department 10:5 10:21 19:6 depending 55:18 depends 22:19 30:10 46:13 60:14 60:16 67:9 85:2 86:10	depicted 34:16 deposed 4:8 deposition 1:10,23 4:18 6:15,17,25 100:13 103:6 104:8,9,14 deputies 13:25 18:5 59:4 93:23 deputy 1:5 4:12 7:19 8:2 9:21,21 18:25 19:2,16,18 21:2,8 24:1 28:24 28:25 48:18,19 49:8,11,12 50:11 50:13 53:23 59:2 59:2,6,7,18,19 60:14,16,22,25 61:2,7,9 62:2,5,13 63:21,22,22 65:23 65:24 66:20,24 67:11,14 68:24 73:10,10 77:3,4,5 78:15,19 79:3,20 79:24 83:3 87:15 88:3 91:9 92:7,16 93:24,24 94:8,9 94:13,14,16 95:20 96:11,22 describe 26:13 28:16 29:5 30:8 30:13 31:15 44:10 58:1 60:25 76:13 described 79:23 description 3:7 42:12 designation 44:5 desk 35:13 detention 8:2,12 10:10 11:6 determine 82:2,7 detox 26:19 Deyton 10:10 dialogue 3:24 Dicudonne 93:24 difference 26:13 50:1 different 8:11,23 9:22 11:25 14:21 15:19 27:23 31:1	45:23,23,24 47:24 54:20 55:1,17 56:2 84:12 85:10 85:19 97:25 99:6 differently 8:16 82:13 difficulties 79:19 dips 44:12 directed 89:19 104:24 directing 21:24 direction 103:9 disassembly 103:12 103:13 disciplinary 22:25 disclosure 4:1 104:1,4 discount 104:16 discovery 1:11 discretion 81:13,14 82:1,2,7 83:19 85:3 discussion 13:11 display 29:15 distance 41:4 distinguishes 27:16 distort 41:11 DISTRICT 1:1,1 divert 99:1 diverted 98:18 DIVISION 1:2 document 3:8 13:17 documents 6:22,24 67:22 doing 7:8 12:9,13 12:21 13:5 23:7 31:23,25 32:21 36:8 38:4 41:8 50:6 52:9,16 53:19 54:8 59:4 59:16 61:10 66:6 69:12,13 76:16 77:5 87:9 88:19 94:3 door 24:8 51:20 76:12,15 77:6,7 78:16 doors 50:25 51:9	51:23,24 dorm 12:8 draw 36:1 40:11 drawing 3:9,10 drawings 53:6 80:13 dress 55:19,20 dressed 24:14,15 drew 39:4 drop 44:19 drops 25:15 duly 4:7 duplicating 38:9 duties 11:25 12:19 48:3,14 duty 17:25 18:3,4 63:12 <hr/> E <hr/> E 4:3,3 E-tran 100:23 earlier 14:7,25 16:5 63:7 70:15 80:14 early 83:10 easier 13:4 43:17 eight 39:11 40:2 58:2 eight-and-a-half 42:20 either 10:11 51:25 electronic 51:20 100:20 eleven 42:20 ellipsis 3:23 email 91:25 92:3,5 92:9 emergency 42:11 47:2,3,5 68:10 Emily 1:15 103:22 employee 103:17 103:19 employer 104:24 encased 40:15 encouraging 23:9 enemies 79:8 enforcement 10:2 55:3 enlarged 65:18 ensued 13:11
--	---	---	---	--

<p>ensure 25:21</p> <p>entail 18:4</p> <p>entered 41:12</p> <p>entering 46:25</p> <p>entity 104:24</p> <p>escort 49:16</p> <p>essentially 12:10 32:5</p> <p>established 84:3</p> <p>estimate 60:12 80:17</p> <p>et 1:6</p> <p>evening 14:21 56:7 66:18 67:15 86:3 90:1 94:22,24,25</p> <p>events 70:18 88:13 89:2 94:21,24,25</p> <p>everybody 43:24 73:3,5 93:8</p> <p>everything's 45:15</p> <p>evidence 103:10</p> <p>exact 11:11</p> <p>exactly 64:14 71:20 84:18</p> <p>examination 1:12 3:1,4</p> <p>examined 4:8</p> <p>example 49:2 94:8</p> <p>Excellent 39:7</p> <p>exchange 79:22</p> <p>excuse 10:14 60:3,3 69:1 96:12</p> <p>exhibit 13:13,16 36:14 38:13,17 43:16,19 44:3 57:18,19,21 59:9 61:16 62:8,25 64:2,4</p> <p>exhibits 3:6,7 32:9 40:6 41:8 50:23 53:5 100:23 101:1</p> <p>experience 9:2 22:15 26:8 82:15 82:16 97:24</p> <p>experienced 16:7,7 17:11,14,20 50:2</p> <p>expires 103:24</p> <p>explain 13:22 36:11 98:22</p>	<p>expressly 103:11</p> <p>extreme 38:19</p> <p>Ezra 1:2 4:14,15 7:5 11:14 20:13 56:24 69:2 70:4 73:4 75:17 96:14 96:25 97:4</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>face 39:10</p> <p>faces 39:11 40:1 53:13</p> <p>facilitate 49:17</p> <p>facility 10:10,25 12:6 15:18 18:7 19:8,9,14 49:18 55:24 68:2,7 99:14</p> <p>fact 46:18 65:10 89:8</p> <p>fair 25:20</p> <p>familiar 26:25 50:9</p> <p>far 16:21 33:2 35:6 46:12 80:14,16</p> <p>fast 63:14</p> <p>faster 65:2 81:3</p> <p>fault 14:9</p> <p>feature 28:6</p> <p>features 27:22</p> <p>feedback 22:21</p> <p>feel 48:16 81:18,21 83:22</p> <p>fees 104:22</p> <p>felt 83:18</p> <p>field 34:18</p> <p>figure 13:4 16:14 93:1</p> <p>figured 83:9</p> <p>file 1:4 42:1 67:15 67:16,18,19,19,21 81:4 83:12 96:15</p> <p>files 44:19 58:25 59:15</p> <p>filing 44:12</p> <p>Filipovitz 2:2 4:13</p> <p>fill 24:10</p> <p>film 44:6</p> <p>finally 45:22</p> <p>financial 104:16,21</p>	<p>financially 103:19</p> <p>find 43:14 58:9 62:18 79:13 80:7</p> <p>finding 23:16</p> <p>fine 7:7 25:2 34:2 39:5 40:11 41:6 46:3,6 58:7,18 93:4</p> <p>fingerprint 61:17 87:7</p> <p>fingerprinting 60:6 61:11,14 62:2</p> <p>finish 12:16</p> <p>first 4:7 5:1 7:22,25 10:2,20 15:25 24:24 29:23 48:11 52:13 55:12 66:25 69:6,8,12,18,20 69:24 70:6 74:11 78:9 80:12 85:19</p> <p>fit 40:7 85:11</p> <p>five 28:12 29:20 85:8</p> <p>fixing 74:7</p> <p>focus 90:18</p> <p>focused 11:4 38:1 59:16 90:24</p> <p>folder 15:16 42:4 42:25 43:2 45:3,5 45:16 46:15,21,21 46:25 55:15 59:17 59:25 60:2,4,6,11 60:13,20,21 68:19 75:24</p> <p>folders 43:5,8,10 44:8,16 45:13,22 45:23 46:4 59:21 59:23</p> <p>folks 11:20 14:4 15:1 16:23 22:16 26:6 27:1,5,13 37:11 47:11 62:19 78:25</p> <p>follow 90:8,13 91:1 91:24 92:5 94:1</p> <p>followed 84:7 90:6 92:3</p> <p>following 3:22 83:4 84:9 104:4</p>	<p>follows 4:8</p> <p>food 18:7</p> <p>footage 43:9</p> <p>foregoing 103:6,9 103:12</p> <p>forget 22:5 24:23</p> <p>forgot 19:5</p> <p>form 21:22 70:21 78:2</p> <p>formalities 1:14</p> <p>formalized 34:4</p> <p>forms 35:1 60:8,10</p> <p>forth 78:6</p> <p>forward 23:4 63:14 70:17</p> <p>found 23:15 80:4</p> <p>four 54:17 100:14</p> <p>frame 44:8</p> <p>free 100:13</p> <p>frequently 84:17</p> <p>fresh 38:8</p> <p>front 45:10,19</p> <p>full 42:19</p> <p>FULTON 103:4</p> <p>functioning 15:8</p> <p>further 103:17</p> <p>future 23:5</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>G 4:3</p> <p>Ga 1:17</p> <p>GCIC 31:6,12,19 31:21 32:6 33:15 33:20 34:19 35:3 35:14,20 36:5,21 40:14,21 55:13,23 57:14 60:10</p> <p>general 26:5,9,14 42:11 45:6 46:8 50:17 60:5,9 68:1</p> <p>generally 39:25 41:7 47:25 88:21</p> <p>gentleman 66:11 75:10</p> <p>Georgia 1:1,13,24 2:4,10,14,18 10:14 11:2 103:3 104:4,5,18</p> <p>getting 22:21 24:15</p>	<p>47:21 55:5 60:4,5 73:7 88:10 94:23</p> <p>give 5:11 36:2 38:8 42:11,18 45:14 65:13</p> <p>given 8:23 25:4 42:1 84:14 103:10 104:17</p> <p>gives 13:25,25</p> <p>glass 76:15</p> <p>glossary 101:4</p> <p>go 5:10 10:12,20 11:11 12:17 13:3 15:13,17,20,25 16:17,19 18:6 20:4 21:13 22:9 22:20 26:5 31:5 34:3 35:6 40:11 45:1 46:8 47:16 49:14 50:23 52:25 53:4,21,22 55:14 58:13 59:14 60:5 60:9,11 66:3 74:9 74:9,17 76:23 77:1,3,6 81:4 86:7 86:8,13 87:2,6,10 87:13 91:2 92:18 97:10,11,12 98:18</p> <p>goes 19:1 24:6 37:2 40:18 71:22</p> <p>going 5:9,17 6:9,19 11:4 16:5,6 22:17 23:5 27:1 30:12 32:8,9 34:13 35:25 38:11 40:5 41:19,22 44:2 45:6 48:16 49:1 49:15 54:17 55:2 55:6,7 60:20 62:22 64:1,22,22 65:15,16 67:10,25 68:1 70:17,20 72:21 74:22 76:24 77:1 80:22 88:23 90:24 97:16 98:3 98:5</p> <p>Gomez 59:3,4,6,19 60:22,25 61:2,7,9 62:2,13 63:21,22</p>
--	---	---	---	---

63:23 73:10 75:13 92:14,17,20 93:15 95:20 96:25 good 4:11 22:4,11 26:11,11 38:4 49:7 55:20,22 61:2 100:1 gown 84:14 gowns 87:7 gray 42:16 great 6:12 66:17 grew 6:1 group 74:13 guess 15:7 16:14 40:19 59:12 70:10 99:9 guidelines 81:10 guy 71:13,14 74:21 80:22 guys 64:23	hazards 85:20 he'll 97:4 head 5:3 14:10 52:12,14 health 25:22 81:6 hear 5:16 16:10 67:7 72:20 76:21 76:22 77:11 90:17 heard 71:12,17 72:25 74:18,21,25 81:11 83:2,20 84:9 89:25 94:25 hearing 69:16 83:4 92:10 95:4,6 96:11 height 68:6 held 44:16 help 6:19 7:3 38:16 50:4 62:16,16 65:18 80:3 88:11 90:15,19 helpful 26:6,24 33:23 41:9 50:16 62:19,21 79:13 helping 61:13 62:2 Hensel 1:16 2:16 hey 45:13 47:7 56:17 82:18 85:7 85:8 93:6 98:3,5 98:25 highlighter 65:6 hired 7:22 histories 68:13 history 60:10 68:14 81:5 hit 71:12 72:12,15 72:20 holding 3:10 24:18 24:21 27:3,17 28:11 38:1,5,25 39:2 41:18 42:3,8 46:19 58:21,25 67:20 holds 55:13,19 home 55:6 honest 62:20 hospital 25:24 98:18,20 99:2,3 hour 48:9 52:24	60:15,21 hours 74:15 90:4 91:13 housed 26:19 48:7 87:8 houses 26:17 35:13 housing 13:24 26:18 27:12 31:12 37:13 48:7,18,19 49:14 50:15 85:2 87:9 98:2 HUFF 2:12	initiate 85:12 86:21 initiating 86:16 inmate 18:5 46:15 50:11,12 59:5 65:5 71:12 81:19 86:22 inmates 18:8 47:1 48:5,6,7 49:18 53:24 54:2 59:15 81:17 input 41:14,17,20 46:21 68:17 inputted 24:18 inputting 15:14 inquiry 104:23 inside 23:17 24:11 24:16,17 institute 97:20,21 instructing 70:25 intentional 3:22 interact 26:2 72:3 interacting 56:25 interactions 21:18 22:6 intercom 28:14,19 71:9,13,22 72:1,5 72:20 74:5,6 75:3 75:7 80:21 intercoms 30:1,3 interest 104:21 interested 99:10 103:20 interject 83:23 interrupt 58:17 interruption 3:23 interviewed 91:4,6 investigator 89:21 90:2,5 91:12 involved 8:4 52:9 85:5 ISD 49:24 50:3,3 50:10,15,16 issue 16:18 it'll 61:12 itemize 42:18,23 items 85:19	jacket 42:17 Jackson 1:10 2:16 3:3 4:6,12 44:7 100:15 102:7 jail 10:6,7 11:5,7 12:1,6 14:22 16:16 19:17 21:21 22:8 23:17 24:7 24:10 26:8,12 35:21 50:7,14 54:24 61:7 68:15 69:3,10,15 95:24 97:6,20 98:17,18 98:21 99:5,18,19 jailer 10:18 23:23 JAMES 2:6 james@slater.legal 2:7 JASON 2:9 Jason@wmwlaw... 2:11 JFIT 12:5,6,18 job 52:5 Joined 78:4 joking 80:25 81:24 82:22 JTO 12:1 judge 69:14,15 70:7 Judicial 104:4 July 14:5,9,11 19:23 61:1 jump 52:3 71:6 jumpsuit 84:13 jumpsuits 65:6 jurisdictions 37:12 Justice 10:6,22 19:6 Juvenile 10:5,21 19:6
Hall 9:21,23 13:1 15:3,20 16:18 66:12 93:9,20 hallway 38:20 halting 3:23 hand 32:14 35:19 44:15 63:18 65:9 68:23 handle 17:8 hanging 34:23 happen 18:16 46:11 69:9 85:11 97:19 happened 7:4 14:9 14:14 53:16 79:23 84:10 88:3,6,13 92:14 93:2 95:11 happening 20:22 32:17 54:15 66:6 76:19 happens 25:11,12 31:10,15 39:20 98:9 happy 6:7 16:9,11 73:25 hard 33:24 80:7 101:3	H	I	J	K
		identification 13:14 36:15 38:14 43:20 61:20 63:1 identifies 42:14 identify 65:14 illness 81:6 immediate 19:10 immediately 99:11 impression 22:7 incident 4:16 7:5 11:13 12:7 14:13 14:14 20:12 70:13 70:14 74:4 75:1,2 75:3,7 81:20 82:21 87:13,14 88:13 89:12,14,15 89:17,19,24 90:4 90:9,16 91:1,5,14 92:11,13,19,20 95:13 104:19 incidents 99:18,20 independent 104:25 index 3:1,1,6 101:4 indicate 3:22,23 individual 63:17 individually 22:19 individuals 65:25 information 41:21 42:10 46:16 47:10 61:12 68:4,11,19 75:23 80:23 81:11 98:16,19 initial 25:11 initially 17:24		

khaki 63:23	10:2 55:3 104:20	28:20,25 29:3,4	making 59:15 60:7	money 29:8
kill 72:21 74:7,22	layout 30:7	31:7,12 39:18,25	60:8 63:2	Monique 1:5 2:8
80:22	learn 20:21 99:19	42:15 50:13,15	mandate 23:12	95:17
kind 7:16 9:10	learned 6:2	52:4 53:12 57:9	91:3	monitoring 52:5
10:17 15:12 18:17	leave 19:13 25:1,17	58:25 71:18 76:18	mandated 19:24	months 19:7
21:5 24:3 42:1	55:22 86:22 87:3	location 41:10	23:11	morning 87:23,25
60:17 68:4 77:14	87:8 88:1 96:25	lock 51:21	March 31 103:24	88:1
99:10	led 70:19 71:6	log 21:6	mark 32:9 36:13	mother 66:25 67:12
kitchen 17:25 18:3	ledge 45:10	long 5:10 8:7 9:15	37:5	move 70:17 81:3
18:4,5,6,8,9,12,13	Lee 2:9	19:5 48:15 60:12	marked 13:13	85:9,18
20:17 53:22,23,25	left 32:14 34:8 35:4	60:18,19 69:19	36:14 38:13 41:1	moved 59:17 70:8
53:25 54:2	45:18 91:2	74:10 75:20 76:2	43:19 57:21 62:25	84:12
kitchenette 35:16	legal 2:6 21:24	76:7,16 78:19	mashed 74:6	movement 49:8,11
37:4 40:19 51:5,6	70:24	81:23 89:15	mass 12:7	49:25 50:4,6 59:8
kneeling 80:5	Leon 1:24 2:3	longer 18:13 22:17	material 3:24 68:19	70:2
knew 54:17	let's 13:3 30:12	79:5	meal 21:9,9	multiple 9:20
know 5:10,19 6:6,8	36:12 37:5 41:7	look 13:7 14:20	mean 8:14 22:15	
6:13 7:10 11:21	44:3 47:18 52:23	15:16 17:21 28:17	31:17 39:14 40:16	N
18:13,15,17 20:1	52:24 56:17 73:8	29:5,7 30:6,12	40:22 54:23 60:1	N 4:3
23:25 26:7,7	87:13 97:10,11	33:20 35:4 36:12	60:17 74:19 87:18	name 4:12 42:10
32:20 34:1 37:10	level 59:13	39:1 45:17 81:4	88:15 93:3	55:13 68:6
39:24 44:7,17	Lickliter 15:3,4,13	97:24 100:12	means 48:9 97:6	nature 104:24
47:14 53:18,24	15:24	looked 83:11	medical 24:21,25	NE 2:13
54:11,13 55:9	lieutenant 8:22	looking 15:1 17:1,2	26:19,20,23,24	near 32:23 34:22
56:10,12 61:5	13:1 15:2,20	17:24 23:4 30:10	27:6,8 49:14 60:9	57:14
62:20 64:13 65:9	20:11 57:7,23	33:20 35:3,8	85:9,11,16,22	nearest 16:21
66:17 68:3 69:23	58:12 86:12 93:7	38:17,25 39:10	meeting 20:20	nearing 97:11
72:6 73:6,10 75:9	93:9	40:1 45:16 60:18	53:19 70:15	necessarily 21:13
75:20 77:9,12	light 28:22	79:25	men 54:16,17 58:25	45:14 47:4 49:1
79:14,19 80:7,13	line 3:8 74:8	looks 13:7 28:21	mental 81:6	67:9 84:22 99:7
80:16 85:7,16	lines 5:4 9:3 84:8	38:19 40:14 62:20	mentioned 11:20	need 5:7 6:6,9 7:10
86:12 93:24 94:15	96:18	65:22	14:24 30:17 56:13	15:13 21:14 26:19
94:23 95:10 98:4	lineup 13:20,21,22	lost 84:13	71:8	39:24 45:13 47:8
98:16 100:5 101:4	13:23	lot 26:8 33:25	Merit 92:7,10 95:4	47:19 48:6 49:14
knowledge 76:6	list 14:4 15:1 17:1,3	48:14 58:20 60:10	95:6 96:11,13	51:19,20 55:4
known 99:14	17:3 42:22 47:13	61:4 67:10	met 69:20	60:8 66:3 73:6
knows 47:11	48:13	loud 67:9 72:10,11	metal 29:10,12	81:21 83:22 86:10
	listed 14:11 15:5	77:14	mid 35:19	87:2 88:11 90:19
	20:16	louder 5:20	middle 44:13,24	92:21 93:7 95:10
	listing 36:18	lowest 16:17	mind 38:4	99:23
	litigation 104:17		mini 101:3	needed 48:25 49:13
	little 5:11,19,20	M	minimum 60:15	56:20 61:5 74:15
	7:15 24:2 35:16	M 2:6	minor 16:21	79:14 80:3 86:5
	41:11 52:24 53:18	ma'am 32:23 48:4	minute 30:6 80:19	86:12 90:15
	65:2,11,18,18	67:17 91:7	minutes 84:16,16	needs 27:6 81:19
	93:25 94:9,10,13	machine 24:11	84:19	negotiating 104:21
	94:14,16	61:18	mixed 29:23	new 61:2,3
	LLC 2:2	main 90:18	moment 11:24 25:1	Newton 55:6
	located 27:12 28:17	maintained 43:5	63:11 98:21	night 18:3,10,10,19

20:3,3,12 21:8 48:2 52:20 53:5 53:16 54:1,7,9,18 55:7 56:2,21 57:1 58:22 61:9 62:1 64:19 68:25 69:3 69:19 71:7,11 73:23 74:17,24 83:10 95:12 96:15 nine 63:17 64:3,7 nodding 5:2 noise 77:14 nominated 23:23 normal 5:21 20:16 56:9 normally 8:22 18:21 20:10 78:25 100:2 NORTHERN 1:1 Notary 102:14 notes 97:13 Notice 1:13 number 13:13 33:8 36:14 37:10 38:13 43:19 62:25 numbers 29:23 36:18 65:1 68:7 nurse 18:25 19:3 25:3,6,8,10,16 26:2,3,4 38:23 46:9,13,14 47:1,6 47:7,11 64:15,16 66:4 80:12 83:15 93:12 97:21 98:6 98:25 nurse's 38:21 57:23 80:15 nurses 38:22 64:18 93:25 nursing 25:9	objection 21:24 22:9 70:24 observe 76:11 obviously 4:21,21 occasions 46:14 occurred 14:13,17 20:13 87:14 occurring 75:8 October 19:19 odd 5:19 offer 24:15 office 6:24 7:20 8:1 57:3,7,8,23,25 58:10,12 80:15 81:10 86:13,14,14 90:9 91:5 92:11 95:3,11 officer 8:10,12 10:6 10:7,7 11:6,8 12:2 16:25 17:3,5 19:17 21:21 22:8 22:11 23:1,11,14 24:7,14,24 25:15 25:17 47:16 48:2 52:9 61:2 65:20 68:9,10 70:2 72:1 85:24 87:15 92:14 92:17 96:12 98:12 officers 8:24 9:7,8 9:20,22 17:14,17 17:20 22:6,16,23 49:5 52:15 65:22 98:7 OFFICIAL 104:18 oh 12:6 23:20 33:17 34:2 36:8 39:7 40:17 42:14 44:24 58:10 79:12 91:11 99:7 okay 4:17 5:5,7,23 6:10,22 7:2,15,18 7:22,25 8:18 9:5 9:23 10:1,24 11:3 11:20,25 12:9,21 14:7,19 15:4 16:13 17:16,19 19:8,13,23 21:12 21:18 22:1 26:24 27:11 28:1,5	29:22 30:3,12,23 31:22 32:4,11,11 32:14 33:5,11,14 33:17,23 34:13,15 34:18,21 35:2,6 35:12,15,20,20 36:3,12,21 37:1,5 37:9,14,17 38:7 38:16,25 39:3,15 39:20 40:5,13,17 40:21,25 41:6 42:6,19,22 44:2 44:14,21,24 45:8 45:16,21 46:1,3 47:3,15 48:21 49:17 50:8 51:4 51:17,25 53:11 54:4,22 55:5 57:19 58:16 60:22 61:19 63:10,20 64:7,10,16 65:8 65:20,24 66:5,11 66:17 67:3 68:25 69:5,8,15,24 71:11,17 72:6 76:16 77:5,8 79:7 79:13 82:24 85:5 85:18 87:21 88:7 88:21 92:20 93:3 93:9 94:3,18,21 95:2 96:1,10,22 97:24 98:6 99:9 99:16,22 old 29:7 once 24:16 42:3,3 43:2,17 45:5 54:7 55:14 67:20 68:5 72:15 73:2 81:11 86:21 92:19 one's 33:5 ones 36:18 open 18:9 51:9,19 51:20 66:1 67:3 86:3 operate 50:25 operated 51:25 operator 28:23 opposite 32:2 33:11 oral 5:2 21:3	orange 42:7 order 6:24 7:3 10:18 104:23 orders 56:19 100:17 Ordinarily 47:5 orientate 41:10 orienting 37:6 original 103:15 outcome 103:20 outline 36:4 outside 53:8 78:22 <hr/> P <hr/> P 4:3 P.C 1:16 p.m 1:17 20:5,8 63:13,14 66:24 67:1 101:7 padded 27:19,20 27:24 37:14 page 3:3,7 98:23 pair 9:6,8 11:21 paired 9:1,10,18 11:22 pants 63:23 paper 36:2 38:8 42:20 64:12 90:3 paperwork 41:20 41:22 55:14,17,20 70:8 99:2 paraphrasing 71:14 pardon 12:2 parlance 97:6 part 12:4 16:6 23:3 36:12,21 41:11 50:7,13 51:8 61:6 62:1 69:10 82:6 82:10 particular 13:17 19:2 25:6 50:13 52:5 104:19 parties 1:14 103:18 104:16 parts 14:22 67:7 party 103:19 104:12,17,20,20 pass 20:25 21:1	43:16 passing 45:12 95:21,22 pat 24:9 path 23:6,7 patience 5:11 patrol 95:23 pay 29:7 Peachtree 2:13 pen 36:3 people 11:18 53:11 56:2 58:21,24 59:14 62:16,16 65:14 69:12 70:11 72:23 74:14,16 76:7 79:10,10 92:21 93:5 94:4 94:22,24 perform 10:18 performance 8:18 21:21 period 8:4,11,16,19 8:24 9:9,10,12,13 9:15,17,19 21:9 person 15:25 24:6 41:12,17 42:5,6 45:12 46:19 47:8 49:1 54:23 55:16 64:8 72:16 74:13 75:17,17 76:10 82:8 91:21,23 92:2 98:3,5 104:19,24 person's 46:7 61:20 person-to-person 9:16 personally 47:15 personnel 24:22 perspective 8:10 phone 23:15,16,18 48:10 66:24 67:6 67:7 68:7 72:3 84:4,4,21,25 85:1 phones 28:8,10,11 28:12,13 29:2,2,3 29:4,5,7,21,24 photo 61:20 photocopying 103:12,13
---	---	--	--	--

O

O 4:3
o'clock 18:14
100:14
O.C.G.A 104:10,10
oath 6:8
object 21:22 70:20
78:2

physical 41:10 52:1 67:19	62:21 67:15 68:12 71:7,11,17 75:16 75:20 77:3 83:25 88:15 89:11 92:6 100:5	68:12,25 69:3 95:2,3 98:20 99:11,18,19	104:3	reasonable 104:21
physically 73:11 85:18 86:8	pointing 44:10	prioritize 56:10,21	pushed 75:3 80:21	recall 20:14
pick 49:15 72:2	polo 63:23	prison 10:8 11:1 99:12	put 24:16,17,21 29:8 39:5,19 40:5 42:3 45:3,5 46:7 46:15,19 48:5 57:15 61:12,16 62:16 64:22 68:5 81:20,21 82:20 84:24 85:7,8,15 88:23 90:3,21	recalled 70:14
picked 37:12	Ponce 1:24 2:3	private 10:8 11:1 19:8,9,14	putting 39:8 43:4 68:19 85:6	receive 23:13
picture 43:11,22,25 51:6,7 60:7 66:14	popped 54:19	privilege 96:19		received 66:24
pictured 38:2	population 26:5,9 26:14 27:4 45:6 46:8 50:17 60:5,9 68:1	privileged 7:10 96:4		receiver 29:12
pictures 40:6 63:10	port 24:8,9 25:13 38:19,20 40:23	probably 40:18 48:17 60:19		receiving 56:19
piece 29:11 36:2 38:8 64:12	portion 33:6	probation 8:10,13	Q	recognize 13:17 34:15 64:8 65:20
pill 18:17,18,23 48:10 66:6	position 7:25 8:4 10:2,21 11:5 19:10 49:22 50:5 62:6	probationary 8:4 8:16 9:13	question 15:15 16:3 16:21,22 21:23,25 22:2,4 26:10 39:9 46:17 70:21,24 86:24 88:17 89:2 90:22	recollect 7:4
pixelated 65:16	positions 10:11 50:2	problem 5:9,23 25:22 65:14	questions 5:11 14:8 16:5,25 17:4 61:3 61:4 79:14 80:6 97:11 98:25 100:3 100:6,8,10,11 103:8	recollection 12:24 14:12 72:19
place 41:18 43:7,17 45:15 58:13 61:14 84:20 85:4 86:23	positive 22:21	proceedings 3:1 101:6	quick 52:25 53:4	record 13:10,12 34:1 61:13 97:16 100:17 103:10
placed 24:11 42:7 76:6 84:11	possible 12:15	process 23:3 24:4,5 26:1 27:2 41:8,12 41:16 47:6 48:5 55:10,10,12 58:24 96:14 98:1 99:22	quirks 4:21	recorded 103:7
places 54:20	post 20:24 21:2	processed 76:3	quite 96:10	recording 5:18
plain 64:15	posted 14:20,21	processing 55:10	quote/unquote 96:19	redirect 100:4
Plaintiff 1:3,11 2:2 4:14	posts 14:1	prohibited 104:10 104:21,21		reduce 103:8
platform 29:1 30:17,18,19,23 31:1,5,13,16,22 32:15,18 33:12 34:17,25 35:9 36:22 38:18 39:9 39:18 40:3,10 42:4 43:6 51:9 53:22 58:2,4,5 67:8 71:20 75:9 75:14 79:24	potentially 85:20	prominent 38:18		Refer 92:21
play 72:2	POWELL 2:12	promise 5:12		referral 104:13
played 34:4	practical 59:13	property 24:17 42:13,15,23 55:20		referring 59:9 82:20
playing 75:11 81:1	Practice 1:13	protocol 84:9 85:12 86:16,22,23 98:12		refers 50:16
please 16:3 37:21 50:23 81:16	practiced 45:17	protocols 10:12 97:20,22		refusing 96:14
PLLC 2:6	praised 23:16	provide 47:10 104:7,11		regarding 104:23 104:24
pod 13:24 87:9 98:2	pre-shift 20:10,14 53:19	provided 1:12	R	regular 9:23 12:22 14:3,4 63:16
Pods 49:14 50:15	preparation 95:15	psychiatric 99:11	R 4:3 102:1	regularity 18:16
point 6:6,10 11:7 11:22 17:12,16 23:22 24:7,20,20 25:4 34:19 35:2 46:7,11 53:17	prepare 6:15,17,25 7:12 18:7	Public 102:14	radio 86:12,15,18 87:11	Regulations 104:3
	prepared 6:23	pull 26:4 32:7 47:8	Ramirez 9:21	related 14:8 59:5 104:18
	presented 4:1	purpose 4:25 25:20	ranking 16:17	relates 10:1 45:22 49:4 50:19
	press 28:22 66:2 72:4,6	purposeful 3:22	rates 104:16	relationship 104:20
	prevention 81:10	purposes 1:11,12 13:14 35:18 36:15 38:14 43:20 63:1	reached 95:3,5	relative 103:17,18
	previous 21:2 53:23	pursuant 1:13	read 4:25 26:11	release 48:5 55:12 62:16
	previously 98:17		ready 50:23 60:4,6	released 15:17 48:6 54:23,24 55:18
	primarily 50:3 94:4		real 53:4	releases 15:16 54:21 59:23
	principal 104:20		really 11:3 30:10 34:1 59:18 65:10 77:12	releasing 48:20
	prior 20:22 62:18		reason 26:22 41:23 47:3 55:18 68:7 83:7	relieve 21:15
				remember 4:15 6:19 11:10,11,14 22:21 36:19 46:2 46:3 54:1,9 56:4,5

56:19,22,23,25 58:21 62:1 64:16 64:18 66:20,25 67:11,24,24 69:18 69:19 70:3,4,11 70:13,18 71:4,5 71:21 75:15 76:18 77:15,19,20 78:9 80:8 86:2 89:22 90:11,23 remove 85:19 reopen 18:12 repeat 16:11 rephrase 16:9 report 17:25 20:6 20:24 53:20,25 80:23 81:11 89:12 89:14,20,24 91:16 reporter 1:15 5:17 5:25 23:19 99:23 100:16,21,24 103:23 104:5,13 104:19,20,23 Reporter's 4:1 104:25 Reporters 1:23 103:15 reporting 104:8,12 104:13,18,19 represent 4:14 96:2 representative 104:6 request 21:11,14 37:18 required 20:6 47:16 81:11 requires 25:22 respond 93:22 responded 93:6,10 93:12,14 response 77:25 90:22 responses 5:2 responsibilities 12:14 48:1 62:9 responsible 11:17 49:15 52:15 restriction 76:6 restroom 53:1	result 12:1 94:23 Resuming 6:4 13:15 22:3,12 23:21 34:12 36:16 37:24 38:15 43:21 44:1 45:2 47:23 53:3 57:20 58:19 59:11 61:25 63:9 64:6 65:4 71:3 74:1 78:7 96:9 97:17 return 98:19 review 6:18,22 23:3 55:23 reviews 8:18 22:22 rewind 73:8 ridges 36:3 right 5:13 6:12 7:17,20 8:9 9:24 11:8 13:19 14:24 17:17,23 18:15 21:9,18 22:13 23:4 24:2 25:4,12 26:6 28:22 30:19 31:13 32:11,12 33:1,2,4,8 34:5,22 35:4,5,6,11,14,19 36:17,24 37:25 38:4,19 39:6,8 40:15 41:3,5 42:1 44:9,12,15,23 45:10,11,21 46:6 46:11,20,24 49:9 50:12,16 51:11,19 52:3,20,23 53:15 53:15 56:1 57:25 58:3,11,11,20 63:2,11,18,22 65:8 66:8,13 67:4 68:23 71:9,25 72:12,22 73:5,16 74:9,9 75:16,24 76:23 79:5 80:13 84:3,5 86:5,14,19 86:21 87:19 88:12 88:25 89:7,12,24 90:5,6 91:3,14 93:10 94:12 97:9 98:11 100:3,4	ring 96:19 rip 29:9 risk 27:13 Road 1:16 2:17 Robert 10:10 Rock 9:21,21 Rockdale 6:24 7:19 7:22 10:1 19:11 20:1 23:8 25:2 55:16 69:1,2 79:4 81:9,9 91:5 92:11 role 15:7 49:12 59:7 69:24 roles 47:24 rolling 81:8 room 27:20 roster 13:4 14:17 rotation 9:24 48:8 roughly 63:12 80:15 round 87:10 rover 48:22,24 49:20,21,22,24,25 50:3,4,5 62:6,8 rovers 50:13 Rowe 65:23,24 Rules 104:3 run 55:12 running 65:17 <hr/> S <hr/> S 4:3 S-u-p 58:10 Safety 19:15 sally 24:8,9 25:13 38:19,20 40:23 sallyport 98:24 Sanchez 2:12 66:4 80:12 93:12,18 satisfied 55:15 saw 48:21 74:18 75:6 89:25 94:25 saying 34:11 35:15 59:23 71:14 74:8 74:14 77:13,15,19 77:20,25 81:1 82:17,23,24 90:15 94:2 99:2 says 85:13 87:10	scale 41:5 58:6 80:14 scan 24:12 schlep 47:16 school 22:20 scream 83:2 screen 25:10,11,17 32:12 34:8,23 35:19 50:25 51:2 51:10 63:18 68:23 screened 24:25 83:15 screening 25:7,21 26:4 screenshot 43:15 44:3 63:6 seal 103:15 search 24:10,14 searches 12:7,8,15 12:20 68:10 second 13:8 47:22 65:13 71:7 83:20 section 35:19,20 61:17 104:23 security 49:25 50:4 50:11,13 59:7 see 13:3,6 15:4 24:12 30:23 32:19 33:2,9,14 35:11 35:21 38:5,16 40:21,22,25 44:4 44:14 46:8,15 47:1,6,8,18 48:8 55:13,15 58:14,15 62:4,18 63:17 65:9 66:5 69:5 72:23 73:1 76:14 76:23 77:1 78:12 78:15,17,18,22 80:1 81:5 85:22 95:25 seeing 70:14 88:22 88:24 seen 24:21 54:19 69:2 73:21 74:3 85:9 96:3 sees 47:8 send 13:9 43:24,25 63:6	sense 16:6,8 24:3 32:10 34:14 sent 25:24 55:5 sentence 3:23,23 separate 26:8 28:13 31:8 48:19 69:10 99:6 Separately 27:8 sergeant 9:21,23 13:1 15:2,4,13,24 66:12 90:12,13,25 91:8,18,25 92:9 93:9 serious 82:3,8 service 22:18 services 104:8,12 104:18,22,24,25 set 9:17 18:22 21:16 60:19 sets 20:2,2 seven 38:1,6 39:1,2 39:12,13 53:13 54:16,17 58:21 59:1 80:15 shadow 9:11 shaking 5:3 shape 30:7,8,14,18 36:4 shaped 40:15 she'd 79:4 she'll 99:1 sheet 42:20 SHENEQUA 1:10 2:16 3:3 4:6 102:7 Sheriff 81:9 93:24 94:8,9,13,14,16 sheriff's 6:24 7:20 8:1 69:3 81:9 90:9 91:5 92:11 95:3,11 Sheriffs 10:14 shift 8:22 11:16 12:22 13:2,23 14:13,15,17 15:8 15:21 16:23 17:6 17:8 18:3,9,10,10 18:17,19 20:2,3,3 20:4,7,18,22,23
---	---	--	---	---

21:8 47:24 48:2 52:13,18 53:19,23 56:6,9 67:1 70:18 74:2 78:19,24 79:7 87:14,19,24 88:2,5 89:16,17 93:5,22 94:5 97:1 shirt 42:17 63:23 shorter 9:12 22:16 shots 64:10 show 34:13 43:11 50:22 62:22 63:3 63:3 96:10 showed 43:9 shower 24:15 48:10 showing 32:11 34:14 37:3 64:7 shown 13:16 shows 13:21,22,23 43:10 51:1 side 31:6,10,11,14 31:15,19,19,22,23 32:1,2,14,18,23 33:1,11 34:8,22 34:23 35:19,22,23 36:9 37:15 38:19 39:11,13,25 40:1 40:2 44:15,15 58:2 71:25 72:16 sides 30:24 31:8 39:10 sign 55:17 signature 103:15 signed 60:8 70:8 silver 29:8 similar 61:6 simple 39:21 sir 4:16 5:6,14 6:11 6:21 7:1,14 8:6,17 8:20,25 9:4 14:18 14:23 16:2 17:15 18:2 20:15,19 21:7,17 23:2 27:10 29:25 47:4 52:7 56:8 58:15 58:23 62:15 64:9 66:16,22 67:5,13 67:23 69:21 70:16 73:22 76:8,20,25	78:14 79:6,12 81:7,13,15 82:9 82:12 83:13,22 84:2,6,18 86:4 89:6,10,13 91:11 91:15,17,20 92:8 92:12,15 95:1,7 95:16,19 96:21,24 97:2,5 99:15 sit 51:15 sits 51:17 sitting 48:15 situated 30:18 situation 17:8 84:24 six 19:7 29:18 Slater 2:6,6 4:13 slightly 66:14 small 97:12 Smith 1:2 2:3 3:4 4:10,12,14,15 6:1 6:4 7:5 11:14 13:8,15 20:13 22:3,12 23:21 34:2,10,12 36:16 37:22,24 38:12,15 43:13,21,24 44:1 44:23 45:1,2 47:21,23 53:3,17 56:24 57:19,20 58:18,19 59:11 61:25 63:2,8,9 64:3,6,21,25 65:4 67:25,25 69:2 70:4,10 71:3 73:4 73:24 74:1 76:9 78:7,12 80:9 82:21,24 83:2,25 96:5,9,25 97:10 97:15,17 99:10 100:1,12,19 Smith's 66:25 67:12,15 70:19 76:11 81:4 96:14 soft 5:15 6:1 softly 16:10 somebody 88:10 someone's 55:23 61:12 98:24	sorry 6:16 7:6 12:16,23 16:4 19:5,20 23:20 25:1,14 26:10 30:19 32:11,25 34:15 36:6,8,9 39:4 40:8,9,12 43:12 44:14 45:10 51:7 52:11 56:22 58:4,8,16 66:13 70:22 80:6 81:8 88:15 93:3 95:13 96:5 99:25 sort 14:3 29:15 30:6 33:24 37:6 41:9 53:5 59:13 63:24 sound 72:8,9 sounded 31:18 sounds 25:12 51:12 South 2:9 space 67:4 85:2 speak 5:16,19 85:17 speaker 67:7 72:2 speaking 47:25 74:12,13 80:15 SPEARS 2:2 special 26:18 27:4 27:11 31:12 37:13 48:7 specific 27:12 45:14 49:22 specifically 18:24 49:5 56:5 60:1 68:16 77:16 82:25 96:17 99:9 specified 62:24 specify 71:1 speech 3:23 spend 20:17 spoke 73:1 91:8,9 spoken 5:15 6:2 stack 45:11 staff 18:6 20:17 21:19,20 25:3 stairs 35:11 standing 18:25 87:12	start 6:12,18 24:9 41:19 43:4 54:8 63:15 started 8:11 10:5 starts 20:8 36:7 39:21 stated 70:24 103:7 statement 71:18 82:8 83:5 89:11 STATES 1:1 stating 21:23 station 25:7,9 38:21,22 51:12 53:7 57:14 stations 31:1 39:12 stay 45:9 stenographically 103:7 step 24:23 steps 40:20 stick 43:8 sticking 74:5 stood 70:1,10 stop 43:18 stored 43:10 storm 81:8 straight 54:4 Street 2:9,13 stuff 32:10 38:16 81:2 Subscribed 102:16 subsection 104:23 substance 94:12 95:11 Suffice 84:17 suicidal 77:21,23 78:9 81:17 82:18 82:18,20,22,25 83:3,21 85:13 87:2 suicide 27:14,15,16 29:24 53:17 56:24 70:19 71:6,15 73:6 81:5,10,19 81:20,21 82:4,10 82:20 84:7,9,11 84:14,14,25 85:6 85:12 86:2,3,16 86:22,23 87:2,10	88:25 89:3,5 97:8 97:20,21 98:3,5 Suite 1:17,24 2:4 2:10,14,18 summarize 26:25 Sup 58:10 super 57:17 supervise 18:7 supervised 8:15 supervising 11:19 21:20 22:6,22 85:24 supervisor 12:25 13:23,24 15:2,5,8 15:9 16:19,21 23:11 55:21 56:12 56:14,16 57:7 85:4,5 86:6,9,10 86:11,17 87:4,6 supervisor's 57:25 supervisors 8:22 14:25 23:8 56:14 56:20,23,25 57:3 supposed 17:5 36:25 45:15 56:6 61:10 76:2 sure 4:18,20 5:8,21 8:14 9:17 10:16 11:24 13:2 14:10 14:16 15:9,10 23:15 24:12 25:18 29:17 32:9 34:5 39:23 40:13 42:21 47:13 48:11 52:4 52:21 60:7,8 63:2 64:14 66:13 69:6 71:20 73:13,17 74:12 75:9 76:4 76:17 77:2 78:5 78:11,21 82:6 83:16 84:18,23 87:22 88:14,17,18 92:20 98:15,23 99:17 100:17 switch 28:22 sworn 4:4,8,21 102:16 system 15:14 24:19 28:14 41:13,15,17
--	--	---	---	---

41:21 43:4 44:12 44:16 46:1 47:14 48:5 62:16,17 68:17,20	tbuckley@bchla... 2:19 team 12:5,7 14:3,4 tech 24:11 telephone 53:8,11 80:5 91:22 television 51:2 tell 4:22 13:19 14:20 44:6 50:8 56:14 65:19,25 71:5 74:17,20,24 75:6 83:18 85:24 89:7 96:22,25 97:3 98:7 telling 78:1 tells 42:16 87:1 term 50:9 termination 91:10 terms 30:7 56:11 62:12 94:1 99:13 101:4 testified 92:6 testifying 37:19 testimony 95:6 thank 4:11 29:22 37:23 39:6,7 41:8 53:15 58:16 63:6 100:6,14 thereto 103:16 thing 4:22 48:19 80:7 98:14 things 5:1 15:12 18:16 28:16 32:7 34:4 39:21 41:11 45:24 62:13 99:13 think 22:10 23:25 35:7,25 63:16 64:4 66:14 70:23 79:18 83:16 91:13 96:16 98:14 99:16 thinking 71:14 thought 21:21 three 19:9 22:13 44:5 56:13,14,17 59:24 73:11 Tim 2:17 63:4 time 6:9 11:4,22 12:13 13:2 16:20 17:12 18:14,21,22	20:17 21:16 22:17 23:22 25:4 29:23 39:22 47:1 48:15 51:15 52:21 56:17 61:1 63:12 67:15 68:8,8,18 71:17 75:14 76:5,6 77:18 80:24 82:5 83:8 85:4 87:24 90:23 91:16 99:8 100:2,7 times 83:11,14 90:25 99:6 Timestamp 65:3 today 6:19,20 7:13 60:18 95:8,15 99:4 100:14 today's 6:15,17,25 toilet 28:1 toilets 27:21 told 17:25 23:10,12 80:22 82:25 96:13 top 30:13 65:8 touch 95:17 tough 65:10 Tracey 1:5 2:8 59:2 59:4,7,19 62:5 66:20,24 67:11,14 68:24 73:10 75:13 77:3,4,5 78:15,19 79:3,20,24 83:3 83:24 87:15 88:3 89:7 92:7,16 93:16 95:18 96:11 96:12,23 97:3 Tracey's 91:9 train 79:16 trained 11:18 82:2 82:13 trainer 17:19 training 9:7,8,8,10 9:12,15,17,19 10:6,6,12,17 11:7 11:12,17 12:1 17:16 82:6,11 trait 6:2 transcript 3:22 4:24 103:9,13 transfer 31:19	transferred 68:1 transferred 55:2 transition 19:17 transport 31:6,10 31:11 32:1 35:22 35:23 36:9 37:8 37:11 40:22 49:17 trauma 88:24 traumatic 92:24 true 103:10 truth 4:22 try 65:10 trying 16:14 26:11 31:18 34:5 58:9 71:4,5 86:25 92:25 Tuesday 1:18 tune 77:14 turn 24:2 two 4:17 18:14 27:15 28:16 31:8 32:4 33:9 35:13 39:10 40:5 44:17 49:7 50:1 65:25 77:16 79:7 80:18 83:11,14 90:4 91:13 99:5,6 101:2 typed 100:18 typewriting 103:9 typically 33:6 50:14 51:17 53:20	understood 39:15 48:1 98:15 unfinished 3:23 unh-unh 5:3 unhappy 81:18,22 uniform 22:17,20 42:7 95:23 unit 71:8 UNITED 1:1 unprocessed 97:1 unwrapped 80:8 upset 76:12 83:9,23 use 45:23 48:10 52:25 usual 104:15 usually 5:20 25:3 49:6
T 102:1 table 44:25 45:18 take 6:7 11:25 21:15 30:5 33:8 36:12 42:25 43:14 46:20 47:22 52:23 52:24 60:12,14,20 61:14 80:19 83:4 83:19 97:12 100:19 taken 1:10 53:2 84:8 94:15 97:14 talk 5:8 6:20 7:12 7:15 15:13,20 16:10 53:5,16,22 55:9 59:25 67:14 72:5,17 73:20 74:2,19 77:6 82:19 87:15 88:3 88:6,12 89:2,25 92:10,13,14,17 93:7 94:9,21,24 95:10 100:2 talked 4:19 6:5,13 37:19 41:7,7 46:12,18 47:24 52:4 53:18 59:13 70:7 74:16 91:12 91:18 92:16 93:1 95:4 97:19 98:14 99:16 talking 7:2,9 37:21 43:22 48:15 49:21 63:7 67:6,11 73:2 73:9 75:10,12 88:9,10,10,18,21 89:8 90:2 94:2,5 95:9 taser 12:8 tasks 8:23 56:5 Tatum 90:12,13,25 91:8,19,25 92:9 95:5	V v 30:14,15,18,21 varies 9:16 18:22 various 55:17 VEAL 2:13 100:8 100:23 versus 36:5 48:17 Victor 30:15 video 3:12 64:23,23 64:24 68:22 videos 6:18 30:5 view 35:3 51:10 62:22 viewed 50:21 virtually 69:13 visual 24:14 34:18 vs 1:4	U U 102:1 uh-huh 5:3 unavailable 25:9 understand 6:14 7:11 12:4 14:2,19 21:8 26:12 31:17 34:6 38:17 59:12 63:5 66:8 86:25 95:8 understanding 8:3 17:23 37:25 39:14 40:14 41:25 53:6 57:22 62:5 66:23 74:19 78:8 79:3 83:17 86:24 96:13	W W 2:3 wait 55:21 waiting 37:12 45:7 waived 1:14 walk 87:5 walking 64:11 80:18 wall 28:21 29:4 33:1 36:25 37:19 37:20 39:19 40:10 40:11,13,15,16,17 50:24 51:4,8 want 4:19 6:13	

13:6 14:10 30:6 32:9 43:18 53:15 63:3 73:6 87:10 90:3 96:7,18 97:4 97:18 100:16,18 100:21,24 101:1 wanted 6:12 48:12 53:4 98:15 wanting 6:14 7:11 47:21 warrant 25:16 45:7 warrants 41:23 wasn't 10:2 11:2,19 14:14 21:12 74:12 82:10,25 86:14 90:4 99:8 watch 81:19,20,21 82:20 84:11,25 85:6 87:3,11 98:4 98:5 way 9:6 13:9 20:21 34:14 37:2,6,6 38:9 39:6,8 45:8 54:21 90:18,21 WAYMIRE 2:8,9 78:2 100:9 we'll 6:7 36:11,12 36:13 43:14,15,16 47:22 63:16 64:3 64:4 85:15 86:15 87:11 100:19 we're 4:17 6:9,19 11:4 26:3 30:12 32:8 35:25 38:1,9 38:17 39:10 40:1 44:2 63:11,15 64:4,5,11,22 65:17,24 68:22 74:5 87:11 97:15 98:23 we've 46:12 52:23 84:3 85:7 98:14 wear 65:5 weeks 91:3 99:5 weight 68:6 wellness 52:16 went 10:7,25 22:20 23:11 54:4 73:11 73:21 75:5 77:17	80:1,2,4 95:13 98:20 weren't 25:18 73:17 79:8 99:4 West 1:24 Whichever 56:16 white 42:17 71:13 71:14 72:21 73:3 74:6,21 80:22 96:19 wide 28:5 WILLIAMS 2:8 Wingo 2:3 3:4 4:12 Wingo@civil-rig... 2:5 wires 29:10 withdrawn 103:11 witness 3:2 4:4,7 5:23 22:1,10 23:20 58:15 61:24 70:22 71:1 78:5 99:25 woman 64:11 won 24:1 words 88:23 work 9:5 10:4 18:13 22:7 26:17 31:2,23,25 32:17 45:4,13 56:11,20 57:4 59:17,17 60:2 78:22,25 79:10,11 92:19 worked 9:20 14:3,5 60:22 workers 18:5 65:5 working 8:12 15:11 15:12,21 16:7,16 20:3 24:4,5 33:4 48:17 56:2,6 58:24 59:2,19,21 59:23,25 64:17,18 77:13 79:4 97:21 worries 5:25 wouldn't 12:21 21:13 84:21 write 37:20 89:14 89:19 writing 89:24 written 3:24 4:23	6:22,23 21:6 61:22 wrong 61:12 71:22 83:18 wrote 58:10,11 89:11 91:16 X X 44:5 Y y'all 13:6 63:6 yeah 15:6 16:4 17:9 33:3 34:2 41:4,5 41:16 43:13 46:18 57:16 61:4 64:25 65:22 89:1 99:9 year 8:8,9 23:23 24:1 69:22 years 19:9 22:13 82:15 Yeha 73:24 yell 77:22 81:17 83:20 yelling 77:9,11,18 78:6 79:22 83:23 yellow 65:6 Z 0 1 1 3:8 13:13,16 59:10 62:8 1:16 1:17 1:24-cv-05158-T... 1:4 1:34 3:11 44:4 10.B 104:3 100% 73:13 12 41:1 13 3:8 41:1 14 39:11 40:2 41:1 58:3 15 39:8 84:15,16 15-14-37 104:18 15-14-37(a) 104:10 15:56 97:15 18:56:23 63:15	19 1:18 19:03:17 64:7 19:04 64:11 2 2 3:9 36:13,14 38:11 40:6 41:9 50:23 53:6 57:19 20:06 65:17 20:07:24 65:8 20:24:26 65:20 20:55:04 65:24 20:55:05 66:5 20206 103:24 2021 7:24 2024 11:3,23 12:13 12:25 14:5,8,9,11 17:12 19:19,21,23 61:1 20240709 3:11 44:4 202478 63:16 2025 1:18 103:21 21:03:17 66:11 21:23:22 66:15 22:03:51 68:22 256-2886 1:25 28th 103:21 2970 1:16 2:17 3 3 3:10,11 38:12,13 38:17 40:6 41:9 50:23 53:6 57:18 57:21 58:12 61:16 3:56 97:15 30030 1:24 2:4 30309 2:14 30329 2:18 30518 2:10 315 1:24 2:3 36 3:9 38 3:10 4 4 3:4,11 43:16,19 44:3 64:5 4:00 101:7 400 2:10 404 1:25 43 3:11	4330 2:9 5 5 3:12 62:25 64:5 64:24 5:45 20:8 52 97:4,6 5754-6869-9805-... 103:23 6 6 64:20 6:00 20:5,5 63:13 63:14 87:25 88:2 63 3:12 650 1:17,24 2:18 7 7 3:10 782024 3:12 62:23 8 8 14:11 8:00 66:24 67:1 84 24:11 865 2:4 9 9 3:12 9-11-28 104:10 950 2:14 999 2:13
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Bull & Associates, Inc.

A Multimedia Court Reporting Company

This Reporting Disclosure was presented at the commencement of the deposition, and is made a part of the record.

DISCLOSURE

Pursuant to Article 8.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Bull & Associates, Inc.

Bull & Associates, Inc., was contacted by the offices of the taking attorney to provide court reporting services for this deposition. Bull & Associates, Inc., will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37 (a) and (b).

Bull & Associates, Inc., has no contract/agreement to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. Bull & Associates, Inc., will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.

OFFICIAL CODE OF GEORGIA ANNOTATED 15-14-37

- (a) Contracts for court reporting services, not related to a particular case or reporting incident, between a certified court reporter or any person with whom a certified court reporter has a principal and agency relationship and any attorney at law, party to an action, party having a financial interest in an action, or agent for an attorney at law, party to an action, or party having a financial interest in an action are prohibited. Attorneys shall not be prohibited from negotiating or bidding reasonable fees for services on a case-by-case basis.
- (b) In order to comply with subsection (a) of this Code section, each certified court reporter shall make inquiry regarding the nature of the contract for his or her services directed to the employer or the person or entity engaging said court reporter's services as an independent contractor.



Shift Briefing and Line-Up Jail Division

GENERAL INFORMATION

Date	7/8/24	Day	Monday	Shift	Team B
Watch Commander	Lt. J. Daniel 2324				
Booking Supervisor	Sgt. Lickliter 2557	Housing Pod Supervisor	Cpl. A. Hall 2383		

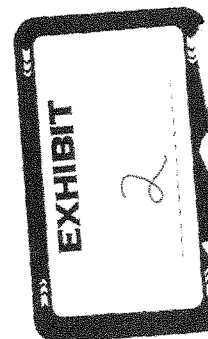
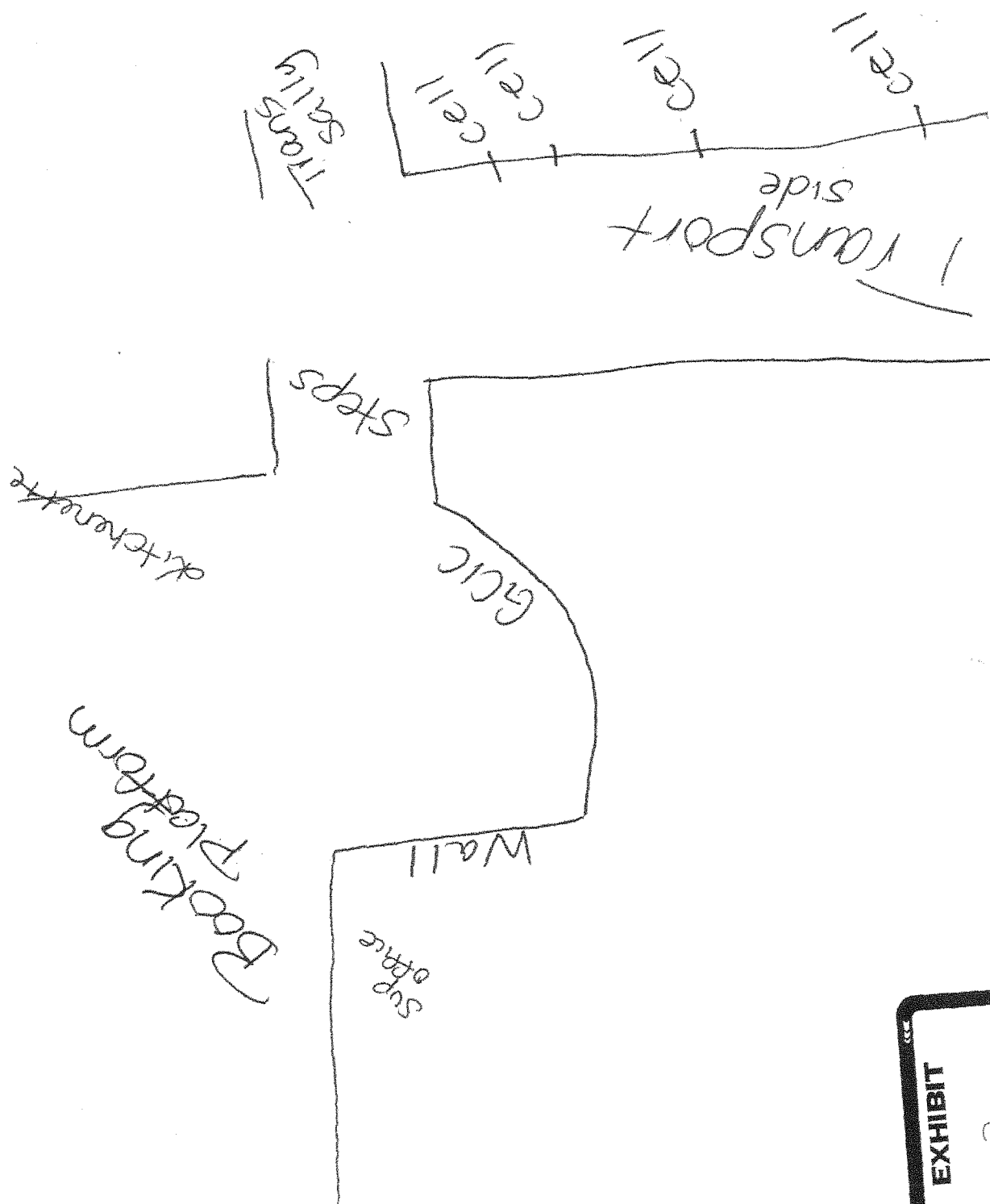
DEPUTY	BADGE #	
Bloom	3037	Medical
Jackson	2907	Kitchen
Stewart	3061	Central Control
Lewis	CIV71	Reception
Renfro	3064	ISD - 4 Pod
Rowe	3059	ISD - 5 Pod
Dieudonne	2918	ISD-Rover
Shired	2374	ISD-Rover
Little	2141	Tower 4
Ramirez	2382	Tower 5
Sajous	3050	Annex
Cunningham	3014	Annex Control
Gomez	3062	Booking
		Booking
Brown	3045	6B
Madison	2364	Men's WR
Tracey	2548	Security Rov./Mov.
		Hospital

NOT ON DUTY Name & Badge #	REASON PTO, Training, FMLA, Admin., Military, OFF	NOT ON DUTY Name & Badge #	REASON PTO, Training, FMLA, Admin., Military, OFF
Hollie 3069	OFF		

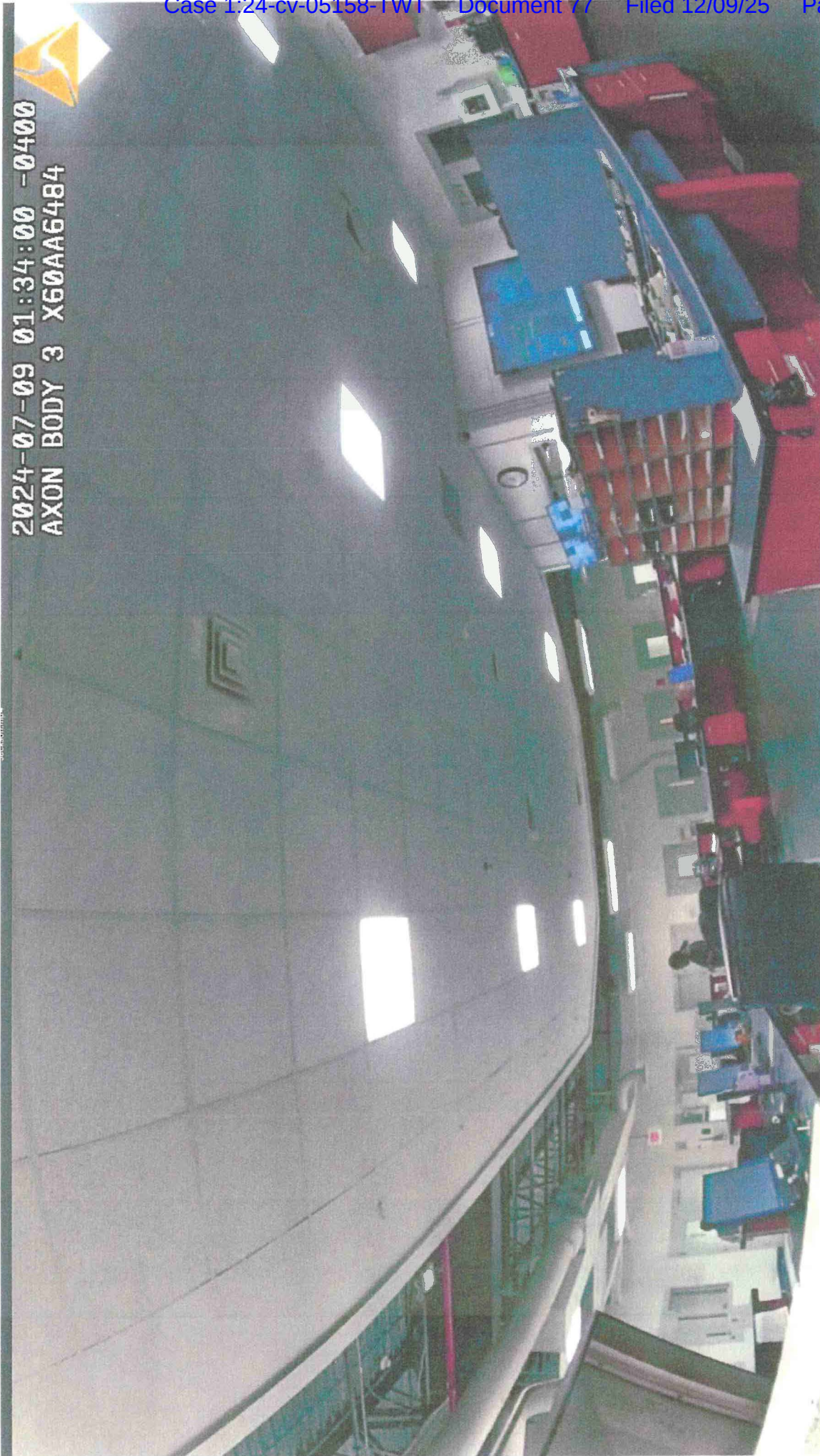
Briefing - Training and Notes
Pass along from the previous shift/ We discussed uniforms and the uniform policy.

Kitchen and Movement deputies report to Booking when there is no duties for their assignment.









2024-07-09 01:34:00 -0400
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EXHIBIT

4